

Babergh District Council  
Local Development Framework  
Growth Scenarios and Broad Locations Core Strategy

Sustainability Appraisal Report

Main Report

June 2010

# Babergh District Council Local Development Framework

## Growth Scenarios and Broad Locations Core Strategy

### Sustainability Appraisal Report Main Report

**June 2010**

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# Glossary

Term	Meaning/Definition
AMR	Annual Monitoring Report
AQMA	Air Quality Management Area
BAP	Biodiversity Action Plan
BDC	Babergh District Council
BREEAM	Building Research Establishment Environmental Assessment Method
CEEQUAL	Civil Engineering Environmental Quality Assessment
CfSH	Code for Sustainable Homes
CO <sub>2</sub>	Carbon Dioxide
CS	Core Strategy
CWS	County Wildlife Site
DCLG	Department of Communities and Local Government
DPD	Development Plan Document
IMD	Index of Multiple Deprivation
LDD	Local Development Document
LDF	Local Development Framework
LNR	Local Nature Reserve
LPA	Local Planning Authority
NNR	National Nature Reserve
ODPM	Office of the Deputy Prime Minister
ONS	Office of National Statistics
PDL	Previously Developed Land
PM <sub>10</sub>	Particulate Matter up to 10 micrometers in size
PPG	Planning Policy Guidance Note
PPPs	Plans, Programmes and Policies
PPS	Planning Policy Statement
RPG	Regional Planning Guidance
SA	Sustainability Appraisal
SM	Scheduled Monument
SEA	Strategic Environmental Assessment
SHLAA	Strategic Housing Land Availability Assessment
SBI	Site of Biological Interest

Term	Meaning/Definition
SPD	Supplementary Planning Document
SSAG	Suffolk Sustainability Appraisal Group
SSSI	Site of Special Scientific Interest
SUDS	Sustainable Drainage Systems

# Non-Technical Summary

This is the non-technical summary of the Sustainability Appraisal (SA) Report, setting out the SA process for the Babergh District Council (BDC) Growth Scenarios and Broad Locations Core Strategy. This document builds upon SA work previously undertaken and set out in the Local Development Framework SA Scoping Report (prepared in 2007) and SA Report prepared for the Core Strategy Issues and Options document (2008).

This SA Report has been prepared to fulfil the requirements for SA arising from the Planning and Compulsory Purchase Act 2004 and the requirements for Strategic Environmental Assessment (SEA) arising from the SEA Directive. The purpose of SA is to promote sustainable development through better integration of sustainability (economic, social and environmental) considerations in the preparation and adoption of plans. The SEA Directive requires that certain plans and programmes undergo an environmental assessment, due to the likelihood that they will have significant environmental effects once implemented.

## The Process Followed

The SA process has involved four main stages to date:

- **Stage A** – Setting the context and objectives, establishing the baseline and deciding on the scope of the sustainability appraisal;
- **Stage B** – Developing and refining plan options and assessing effects. Preparing the Initial SA Report;
- **Stage C** – Preparing the SA Report; and
- **Stage D** – Consultation on the BDC Draft Core Strategy and the SA Report.

## Babergh District Core Strategy

BDC is preparing a Core Strategy DPD, which will form part of the Council's Local Development Framework (LDF). The Core Strategy is the strategic planning policy document that will set out the approach for managing growth and development in Babergh District to 2031. Babergh will be consulting the public about growth scenarios and broad locations for the district. The different scenarios and broad locations are entitled:

### **Housing Growth Scenarios**

Scenario 1: Balancing housing and economic growth

Scenario 2: Address affordable housing needs and market housing needs

Scenario 3: Depressed market and continuing the existing level of development

Scenario 4: Market intervention/ quick market recovery and continuation of existing level of development

### **Employment Growth Scenarios**

Scenario 1: "business as usual"

Scenario 2: 'shortfall' forecast figure and one-third of the former RSS jobs target

Scenario 3: shortfall forecast figure and percentage growth to the jobs target up to 2031

Scenario 4: jobs growth target in accordance with housing growth target

### **Broad Locations**

Hadleigh, Broad Location 1 – East of Hadleigh

Hadleigh, Broad Location 2 – West of Hadleigh

Hadleigh, Broad Location 3 – North of Hadleigh

Sudbury/Great Cornard, Broad Location 4 – South West of Sudbury, Ballingdon

Sudbury/Great Cornard, Broad Location 5 – North of Sudbury  
Sudbury/Great Cornard, Broad Location 6 – East of Sudbury  
Sudbury/Great Cornard, Broad Location 7 – South of Great Cornard  
Ipswich Fringe, Broad Location 8 – Western Ipswich Fringe  
Ipswich Fringe, Broad Location 9 – South West Ipswich Fringe

## Review of Relevant Plans, Policies and Programmes

A review of all relevant plans, policies and programmes (PPPs) was undertaken based upon the list of relevant PPPs identified by Suffolk Sustainability Appraisal Group (SSAG) and developed for the individual nature of Babergh, and identified the relationships between the SA and plans and programmes which, in turn, has enabled potential synergies to be exploited and, conversely, conflicting initiatives to be identified. This has informed the identification and development of relevant sustainability objectives to be used for the assessment process through the SA Framework.

## Sustainability Appraisal Framework

The Sustainability Appraisal Framework is a key tool in completing the SA as it allows the assessment of the effects arising from the Core Strategy proposals in key areas to be assessed in a systematic way. A SA Framework containing objectives and associated indicators has been developed using an iterative process, based on the review of relevant PPPs, the evolving baseline, analysis of key sustainability issues and consideration of which of these issues can potentially be addressed by the Core Strategy. The SA Framework has been revised following the consultation on the LDF SA Scoping Report.

The SA objectives are as follows:

1. To improve the health of the population overall
2. To maintain and improve levels of education and skills in the population overall
3. To reduce crime and anti-social activity
4. To reduce poverty and social exclusion
5. To improve access to key services for all sectors of the population
6. To offer everybody the opportunity for rewarding and satisfying employment
7. To meet the housing requirements of the whole community
8. To improve the quality of where people live and to encourage community participation
9. To maintain and where possible improve water quality
10. To maintain and where possible improve air quality
11. To conserve soil resources and quality
12. To use water and mineral resources efficiently, and re-use and recycle where possible
13. To reduce waste
14. To reduce the effects of traffic on the environment
15. To reduce emissions of greenhouse gases from energy consumption
16. To reduce vulnerability to climatic events
17. To conserve and enhance biodiversity and geodiversity
18. To conserve and where appropriate enhance areas of historical and archaeological importance
19. To conserve and enhance the quality and local distinctiveness of landscapes and townscapes
20. To achieve sustainable levels of prosperity and economic growth throughout the plan area
21. To revitalise town centres
22. To encourage efficient patterns of movement in support of economic growth
23. To encourage and accommodate both indigenous and inward investment



# Habitats Regulations Assessment

There is a requirement for any policies, plans or projects with potential to affect European sites to undergo Habitats Regulations Assessment (HRA) under the European Habitats Directive. There are a number of European sites within the District and located close to its boundaries. Therefore, an HRA of BDC's Core Strategy is required.

A Stage I HRA preliminary review of the BDC Issues and Options Core Strategy Report was undertaken by Atkins in October 2009. This identified that there may be likely significant effects on the conservation objectives and integrity of nine European Sites arising from the development of the broad locations identified for future growth in the Issues and Options Core Strategy. A more detailed Stage II HRA Screening is being currently undertaken, the results of which will be used to inform the next iteration of the SA Report for the Submission Core Strategy document.

## Broad Locations Assessment

Nine broad locations for new development were identified in the Growth Options Core Strategy document and were subject to an assessment in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. These locations represent urban extensions of Sudbury (4 broad locations), Hadleigh (3 broad locations) and Ipswich (two broad locations).

For the assessment of the broad locations there was a need to devise location specific SA criteria to cover, for example, accessibility to schools, healthcare facilities and other community services, accessibility to public transport routes, opportunities to promote non-motorised transport modes, identify specific environmental constraints and establish the proposed uses for each of the broad locations.

In general, the broad locations have been found to perform with a comparable level of positive effects against a number of the SA objectives. All of the broad locations perform well against the social SA objectives mainly as a result of their good accessibility to the key services and facilities by public transport, including health care facilities, schools, employment, supermarkets and shopping areas. The assessment against the SA environmental objectives provides the most differentiation between the broad locations. Potential effects relate to the proximity of sites to flood risk areas; ecological designations; heritage designations; and landscape designations. All of the broad locations perform equally well against the SA economic objectives as a result of accommodating employment and other uses and providing good connections to encourage efficient patterns of movement in support of economic growth as outlined above.

Overall, broad location 5, which is to the north of Sudbury, is deemed to perform the best in sustainability terms. Broad location 6, east of Sudbury, despite being located relatively close to an SSSI (the Edwardstone Woods), is also rated well overall in sustainability terms. Broad location 1, east of Hadleigh, is associated with comparatively lower level of constraints as well. Broad locations 2 and 9, west of Hadleigh and South West Ipswich Fringe, perform least favourable overall in sustainability terms, having the highest number of the environmental constraints. Broad location 4, west of Sudbury, is also significantly constrained.

The rest of the broad locations (locations 3, 6, 7 and 8) have a comparable level of constraints identified. However, it is believed that the size of each of the broad locations offers the potential for avoiding or mitigating most of the possible negative effects.

The findings of this assessment and the forthcoming HRA Screening will need to inform the future site allocations process.

## Assessment of Growth Options

The Babergh Growth Options Core Strategy sets out eight growth scenarios, four housing growth scenarios and four employment growth scenarios. These options have been assessed to predict and evaluate the nature (positive, negative or neutral), scale (significant or non-significant), permanence (temporary or permanent), certainty (low, medium or high) and timeframe (short-term, medium-term or long-term) of the

predicted social, environmental and economic effects. Comments have been made against each of the SA Objectives that comprise the SA Framework.

Considered overall, the scenarios within the BDC Growth Options Core Strategy are predicted to have a range of sustainability effects. Positive effects were predicted against the social and economic indicators. Several negative effects were predicted against environmental objectives. Potential exist to mitigate the negative effects through detailed policies and site specifics. Moderately to strongly significant effects were predicted against the following SA objectives:

- To maintain and improve levels of education and skills in the population overall (Positive);
- To reduce poverty and social exclusion (Positive);
- To improve access to key services for all sectors of the population (Positive);
- To offer everybody the opportunity for rewarding and satisfying employment (Positive);
- To meet the housing requirements of the whole community (Positive);
- To conserve soil resources and quality (Negative);
- To reduce the effects of traffic on the environment (Negative);
- To reduce emissions of greenhouse gases from energy consumption (Negative);
- To conserve and enhance biodiversity and geodiversity (Negative);
- To achieve sustainable levels of prosperity and economic growth throughout the plan area (Positive);
- To revitalise town centres (Positive);
- To encourage efficient patterns of movement in support of economic growth (Positive); and
- To encourage and accommodate both indigenous and inward investment (Positive).

Overall, Employment Scenarios 2 and 3 are deemed to have the most moderately to significant positive sustainability benefits, but these scenarios are also predicted to have a few moderately to significantly negative effects. Scenario 1 is associated with some moderately significant positive effects and no moderately to significantly negative effects. Scenario 4 showed the most positive effects and no significantly negative effects but it also has the least moderately to significant positive effects. The significance of the predicted positive and negative effects could potentially increase in Scenario 4 depending on the exact numbers that will be provided for the scenario. Negative effects predicted for the four employment scenarios could potentially be mitigated or positive effects enhanced by including policies in the submission Core Strategy, Site Specific Allocations and the Development Management DPDs to address the mentioned sustainability aspects (see Appendix B for details).

Overall, Housing Scenario 1 is associated with the most sustainability benefits (including the most moderately to significantly positive effects) although a few moderately significant negative effects have also been identified. Scenario 3 and Scenario 4 showed similar sustainability effects and no moderately to significant positive or negative effects were identified for these scenarios. The most moderately to significantly negative effects were identified for Scenario 2 although a few moderately positive to significantly positive effects were also identified for Scenario 2. Negative effects for the four housing scenarios could potentially be mitigated or positive effects enhanced by including policies in the submission Core Strategy, Site Specific Allocations and the Development Management DPDs to address the mentioned sustainability aspects (see Appendix B for details).

# 1. Introduction

## Local Development Framework

- 1.1 Local Development Frameworks (LDFs) are to be prepared by Local Planning Authorities (LPAs). LDFs comprise a portfolio of Local Development Documents (LDDs). LDDs may be divided into three categories:
- **Development Plan Documents (DPDs)** - subject to independent examination and have the weight of development plan status. DPDs form part of the statutory development plan together with the Regional Spatial Strategy (RSS) prepared by the Government Office, in this case for the East of England.
  - **Supplementary Planning Documents (SPDs)** - not subject to independent examination and do not have development plan status. SPDs build upon policy and the guidance specified in DPDs. SPDs cannot be used to allocate land.
  - **Statement of Community Involvement (SCI)** - outlines how the LPA will consult with key stakeholders and the community. The SCI is subject to independent examination.
- 1.2 The Babergh District LDF is a collection of LDDs and includes a Local Development Scheme (LDS) (which describes the Core Strategy and other Development Plan Documents to be prepared by the LPA including a timetable for their preparation and was adopted in July 2007) and the following LDDs:
- Statement of Community Involvement (SCI) which sets out how consultation will be undertaken and in what format and which was adopted in December 2006;
  - The Core Strategy which sets strategic policy across the City;
  - Development Plan Documents (DPDs) which are planning policy documents setting out the Council's approach to a particular issue or area and, at this stage, are intended to include Site Specific Allocations and Development Control Policies DPDs;
  - Supplementary Planning Documents (SPDs) which give more detail to policies in the Core Strategy or other DPDs. The Council has already produced a Safeguarding Employment Land Supplementary Planning Document (adopted in March 2008), an Affordable Housing SPD (Adopted in April 2009) and Hamilton Road Quarter (Sudbury Town Centre Redevelopment) SPD (adopted in 11 February 2010).
  - Annual Monitoring Report (AMR)
- 1.3 The Local Development Framework, in time, will replace the Babergh Local Plan, Alteration No 2, for the period 2006 -2016. The Local Plan was adopted in June 2006.

## Babergh District Core Strategy

- 1.4 The Core Strategy is a strategic document that sets out the long term spatial vision and strategy for the Babergh District. The production of the Core Strategy has been undertaken in stages, in accordance with national legislation. In March 2009, an Issues and Options Core Strategy report was published for consultation. Following receipt of the consultation comments and the recent abolishment of the RSS, a second report has been produced which details the Growth Options Core Strategy, which is the focus of this SA report. Subsequently, a third iteration of the Core Strategy document will be produced namely a Submission Core Strategy. This third iteration is anticipated to be completed in mid 2011 and will be published for further consultation and thereafter submitted to the Secretary of State.

# Geographical Area

- 1.5 The Babergh District is mainly rural in character and covers an area of 230 square miles (596 square kilometres). On its immediate fringes lie the town of Bury St Edmunds to the north, Ipswich to the east and Colchester to the south.

*"The Babergh District was created on the reorganisation of local government from five former local authorities in South Suffolk...Although the name of the District may not generally be known outside East Anglia, many of the towns and villages in the District are nationally known."*<sup>1</sup>

- 1.6 Figure 1.1 and Figure 1.2 below show the geographical context of Babergh District as well as its split into wards and parishes.

Figure 1.1 – Geographical Context<sup>2</sup>



<sup>1</sup> <http://www.south-suffolk.gov.uk/Babergh/Home/About+us/Babergh+Background.htm>

<sup>2</sup> <http://www.south-suffolk.gov.uk/Babergh/Home/About+us/Babergh+Background.htm>

Figure 1.2 – Wards and Parishes<sup>3</sup>



<sup>3</sup> <http://www.babergh.gov.uk/NR/rdonlyres/D7CC0F22-ACA0-4A67-84E1-052411F0663B/0/pandwmap.pdf>

## Requirement for Sustainability Appraisal

- 1.7 Under the Regulations<sup>4</sup> implementing the provisions of the Planning and Compulsory Purchase Act 2004, Sustainability Appraisal (SA) is required for all LDDs. The Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008 removed the requirement for SA for SPDs, although LPAs are still required to screen their SPDs in relation to both SA and Strategic Environmental Assessment (SEA). The purpose of SA is to promote sustainable development through better integration of sustainability considerations in the preparation and adoption of plans. The regulations stipulate that SA of LDDs should meet the requirements of the SEA Directive.
- 1.8 Planning Policy Statement 1 (PPS1) describes Sustainability Appraisal in Paragraph 9 of Annex B: *'A Sustainability Appraisal is intended to assess the impact of plan policies from an environmental, economic and social perspective. It is intended to test the performance of a plan against the objectives of sustainable development and thereby provide the basis for its improvement'*.
- 1.9 SA thus helps planning authorities to fulfil the objective of contributing to the achievement of sustainable development in preparing their plans.
- 1.10 There are many definitions of sustainable development. However, the most commonly used and widely accepted is that coined by the World Commission of Environment and Development in 1987 as: *'Development which meets the needs of the present without compromising the ability of future generations to meet their own needs'*
- 1.11 The UK Government's Sustainable Development Strategy 'Securing the Future', published March 2005, outlines a set of shared UK principles which will be used to achieve the goal of sustainable development. The guiding principles have been agreed by the UK government, Scottish Executive, Welsh Assembly Government and the Northern Ireland Administration. They bring together and build on the various previously existing UK principles to set out an overarching approach. The five guiding principles will form the basis for policy in the UK. For a policy to be sustainable, it must respect all five of these principles in order to integrate and deliver simultaneously sustainable development:
- **Living within environmental limits** – respecting the limits of the planet's environment, resources and biodiversity to improve our environment and ensure that the natural resources needed for life are unimpaired and remain so for future generations;
  - **Ensuring a Strong, Healthy and Just Society** – meeting the diverse needs of all people in existing and future communities, promoting personal wellbeing, social cohesion and inclusion, and creating equal opportunity for all;
  - **Achieving a Sustainable Economy** – Building a strong, stable and sustainable economy which provides prosperity and opportunities for all, and in which environmental and social costs fall on those who impose them (polluter pays); and efficient resource use incentivised;
  - **Promoting Good Governance** – Actively promoting effective, participative systems of governance in all levels of society – engaging people's creativity, energy and diversity;
  - **Using Sound Science Responsibly** – Ensuring policy is developed and implemented on the basis of strong scientific evidence, whilst taking into account scientific uncertainty (through the precautionary principle) as well as public attitudes and values.

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<sup>4</sup> Town and Country Planning (Local Development) (England) Regulations 2004. The Regulations came into force on 28 September 2004.



## Requirement for Strategic Environmental Assessment

- 1.12 The EU Directive 2001/42/EC on the assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') came into force in the UK on 20 July 2004 through the Environmental Assessment of Plans and Programmes Regulations 2004.
- 1.13 The Directive applies to a variety of plans and programmes including those for town and country planning and land use. The LDF is prepared and adopted by an authority at the local level and is required by legislative provisions. It is prepared for the purposes of town and country planning/land use and is likely to have significant effects on the environment. It is therefore the case that the DPDs and SPDs prepared as part of the Babergh District LDF are required to be subject to environmental assessment, under the SEA Directive.
- 1.14 The overarching objective of the SEA Directive is:
- "To provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans... with a view to promoting sustainable development, by ensuring that, in accordance with this Directive, an environmental assessment is carried out of certain plans... which are likely to have significant effects on the environment." (Article 1)*
- 1.15 SEA is an iterative assessment process which plans and programmes are now required to undergo as they are being developed, to ensure that potential significant environmental effects arising from the plan/programme are identified, assessed, mitigated and communicated to plan-makers. SEA also requires the monitoring of significant effects once the plan/programme is implemented.
- 1.16 The SEA Directive and the SEA Regulations state that the SEA must consider the following topic areas:
- Biodiversity;
  - Population;
  - Human Health;
  - Flora and Fauna;
  - Soil;
  - Water;
  - Air;
  - Climatic Factors;
  - Material assets;
  - Cultural heritage, including archaeological and built heritage;
  - Landscape; and
  - The interrelationship between these factors.

## The SA Process

- 1.17 The requirements to carry out SA and SEA are clearly distinct, but guidance<sup>5</sup> from the Office for the Deputy Prime Minister (ODPM – now Communities and Local Government (CLG)) states that

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<sup>5</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005

it is possible to satisfy both through a single appraisal process and provides a methodology for doing so. Therefore, from herein, the process encompassing SA and SEA will be referred to as SA.

1.18 According to the same guidance, the main stages in the SA process are as follows:

- **Stage A** – Setting the context and objectives, establishing the baseline and deciding on scope;
- **Stage B** – Developing and refining options and assessing effects;
- **Stage C** – Preparing the Sustainability Appraisal Report;
- **Stage D** – Consultation on the plan and the Sustainability Appraisal Report; and
- **Stage E** – Monitoring the significant effects of implementing the plan.

1.19 The ODPM guidance emphasises that SA is an iterative process which identifies and reports on the likely significant effects of the plan and the extent to which its implementation will achieve the social, environmental and economic objectives by which sustainable development can be defined. The intention is that SA is fully integrated into the plan making process from the earliest stages, both informing and being informed by it. The guidance also sets out a requirement for the preparation of the following reports:

- **Scoping Report** (documenting Stage A work) which should be used for consultation on the scope of the SA;
- **Sustainability Appraisal Report** (documenting Stage B work) which should be used in the public consultation on the Core Strategy DPD. The final SA Report fully encompasses the requirement to produce an Environmental Report under the SEA Directive.

1.20 Table 1.1 sets out the various SA stages, tasks and relationships with the DPD preparation, as set out in ODPM guidance.



**Table 1.1 - Incorporating SA in the DPD Preparation Process**

<b>DPD Stage 1: Pre-production – Evidence Gathering</b>
<b>SA Stages and tasks</b>
<p>Stage A: Setting the context and objectives, establishing the baseline and deciding upon the scope</p> <p>A1: Identifying other relevant policies, plans and programmes, and sustainability objectives</p> <p>A2: Collecting baseline information</p> <p>A3: Identifying sustainability issues and problems</p> <p>A4: Developing the SA framework</p> <p>A5: Consulting on the scope of the SA</p>
<b>DPD Stage 2: Production</b>
<b>SA Stages and tasks</b>
<p>Stage B: Developing and refining options and assessing effects</p> <p>B1: Testing the DPD objectives against the SA framework</p> <p>B2: Developing the DPD options</p> <p>B3: Predicting the effects of the DPD</p> <p>B4: Evaluating the effects of the DPD</p> <p>B5: Considering ways of mitigating adverse effects and maximising beneficial effects</p> <p>B6: Proposing measures to monitor the significant effects of implementing the DPD</p>
<p>Stage C: Preparing the Sustainability Appraisal Report</p> <p>C1: Preparing the SA Report</p>
<p>Stage D: Consulting on the preferred options of the DPD and SA Report</p> <p>D1: Public participation on the preferred options of the DPD and SA Report</p> <p>D2 (i): Appraising significant changes</p>
<b>DPD Stage 3: Examination</b>
<b>SA Stages and tasks</b>
D2 (ii): Appraising significant changes resulting from representations
<b>DPD Stage 4: Adoption and Monitoring</b>
<b>SA Stages and tasks</b>
D3: Making decisions and providing information
Stage E: Monitoring the significant effects of implementing the DPD
E1: Finalising aims and methods for monitoring
E2: Responding to adverse effects

## Purpose of the SA Report

- 1.21 SA is required to inform the decision making process during the preparation of the Core Strategy. This will ensure that potential sustainable development implications of the Core Strategy are identified and recognised in the choices made by the LPA. The SA must also test the

performance of the Core Strategy in order to determine whether it appears to be appropriate for the task intended.

- 1.22 The requirement to prepare an SA Report arises directly from Article 5.1 of the SEA Directive which states that:

*'An Environmental Report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated.'*

- 1.23 In SA, the SA Report incorporates the requirements of the Environmental Report as required under the SEA Directive.

- 1.24 For more information about the work undertaken during the initial stages of the SA process please refer to the Scoping Report and the Issues and Options SA Report on our website. This SA Report takes the process further by reporting on the significant social, environmental and economic effects of the growth scenarios and broad locations. The initial stages of the SA process were undertaken by Babergh District Council (BDC) and Suffolk Sustainability Appraisal Group (SSAG). Atkins was subsequently appointed to take the process further, assessing the broad locations for the Core Strategy and completing the SA Report. Babergh District Council completed the assessments for the growth scenarios contained in this report and associated appendices.

## Suffolk Sustainability Appraisal Group

- 1.25 In 1994, Suffolk's Local Planning Authorities established a work group to compile a common methodology or approach to the SA of Development Plans' objectives, policies and proposals as well as to assess the impact of planning policies and decisions on progress towards sustainable development. The group has evolved to reflect changing circumstances over the years and is now called the SSAG. The group continues to produce annual monitoring information, but the main focus is now concentrated on the statutory requirement to carry out SA incorporating SEA as part of LDFs.
- 1.26 The main area for joint working between SSAG and relevant councils has been Stage A, through the setting of the context and objectives of the DPD, establishing the baseline conditions, deciding on the scope of the SA and developing an appraisal framework of sustainability objectives and indicators. There have been several key areas of joint working that assisted all of the Suffolk authorities in reaching the Scoping Report stage, including:
- Identifying and reviewing of policies, plans and programmes and sustainable development objectives at County, National and International Level that will affect or influence the DPD, SPD and LDF surveys;
  - Collecting relevant social, environmental and economic baseline information and produce a characterisation of the District Council area;
  - Identifying initial issues through the analysis of trends relating to existing monitoring; and
  - Developing the SA framework.
- 1.27 The Scoping Report contains a list of documents compiled by the workgroup. Early consultations regarding the draft SA Framework for Suffolk (incorporating SEA) and responses by the listed consultees is also set out in the Scoping Report.

## Programme and Responsibility

- 1.28 Table 1.2 outlines the timetable and process undertaken to prepare the SA. All SA work undertaken prior to the assessment of the Broad Locations and production of this SA Report (which have been undertaken by Atkins) has been carried out by BDC, in tandem with SSAG where appropriate. BDC also assessed the Growth Scenarios in the Core Strategy.

**Table 1.2 - Key SA Tasks and Outputs**

Task / Output	Date	Comments
SSAG and Babergh Scoping Report	August 2007	This report built upon work previously undertaken by SSAG and includes a review of relevant plans and programmes, baseline information about BDC, identification of key sustainability issues for Babergh and development of a SA framework.
Consultation	Dec 04/ Jan 05 (SSAG document); Feb 2007 (BDC document) Aug 2009 (BDC Updated document)	A wide range of organisations, groups and individuals were given the opportunity to make comments. Feedback was received from 8 of these, most notably from the Environment Agency, Natural England, RSPB, Suffolk Wildlife Trust and English Heritage.
Updated Scoping Report (available on the Babergh website)	September 2009	The 2007 Scoping Report was updated, taking into account the consultation comments received.
Draft Core Strategy Issues and Options Initial Sustainability Appraisal (available on the Babergh website)	May 2009	
Consultation		A wide range of organisations, groups and individuals were given the opportunity to make comments. Feedback was received from 9 of these organisations/ individuals, most notably from Natural England, English Heritage, Suffolk Coasts and Heaths AONB and GeoSuffolk. In response to the comments received the objectives were amended to include 'geodiversity' in addition to 'biodiversity'. 'Geodiversity' was originally considered as part of the framework for the Issues and Options Core Strategy under historic issues but this was amended to be considered with 'biodiversity' issues.
Growth Options Core Strategy SA Report (this report)	April - July 2010	The report presents the appraisal of the Growth Scenarios and Broad Locations Core Strategy.
Submission Core Strategy	Anticipated to be mid 2011	The report will present the appraisal of the submission Core Strategy.

## Consultation

- 1.29 The Core Strategy preparation process provides several opportunities for public consultation and involvement and stakeholders and the public has been consulted on the SA Scoping Report (during 2005, 2007 and 2009); Issues and Options Core Strategy (May 2009); and will be consulted on the Preferred Options (this document) and the Submission Core Strategy. Consultation on the SA of BDC's Core Strategy has and will continue to be undertaken alongside the Core Strategy itself. Consultation responses to the SA Scoping Report can be found in the Scoping Report. Contributions received during the consultation period can be found on the Babergh website. Once the consultation for this Growth Scenarios and Broad Locations has finished the Council will review and respond to comments received during the consultation period. The comments received will be taken into account and considered when producing the next stage of the Core Strategy (Submission).
- 1.30 The Submission Core Strategy will be subject to a formal public consultation period and will be submitted to the Secretary of State. At this stage it is anticipated that this will take place in mid 2011. It will then be subject to an independent examination.
- 1.31 A number of key organisations, including statutory consultation bodies (i.e., English Heritage, Environment Agency and Natural England), were specifically targeted for the consultation process. The SSAG has played an integral role in the formation of the SA Framework and shaping the SA process.
- 1.32 This SA Report will accompany the Growth Options Core Strategy Document on consultation which will take place in September/ October 2010.

## Habitats Regulations Assessment

- 1.33 Under Regulation 48(1) of the Conservation (Natural Habitats, &C) (Amendment) (England and Wales) Regulations 2006 an Habitats Regulations Assessment (HRA) needs to be undertaken in respect of any plan or project which:
1. Either alone or in combination with other plans or projects would be likely to have a significant effect on a European Site, and
  2. Is not directly connected with the management of the site for nature conservation.
- 1.34 European sites include Special Areas of Conservation (SAC) and Special Protection Areas (SPA). Additionally, PPS9 states that consideration should also be given to sites designated as potential SPAs, candidate SACs and Wetlands of International Importance (Ramsar sites). Babergh District is known to contain a number of the above types of sites and it is also located in a proximity to a number of the European sites, and as such, an HRA of BDC's Core Strategy is required.
- 1.35 A Stage 1 HRA preliminary review of the BDC Issues and Options Core Strategy Report was undertaken by Atkins in October 2009. This identified that there may be likely significant effects from the development of the broad locations, identified for future growth in the Issues and Options Core Strategy, on the conservation objectives and therefore the integrity of nine European sites. A more detailed Stage II HRA will be undertaken of the Core Strategy document, the results of which will be used to inform the next iteration of the SA Report for the Submission Core Strategy document.

## 2. Sustainability Appraisal Methodology

### Overview of Approach

- 2.1 The approach used in the SA of the BDC Core Strategy is based on the process set out in the guidance<sup>6</sup> from the ODPM on SA of LDDs. The SA has been conducted to also meet the requirements of the SEA Regulations<sup>7</sup>.
- 2.2 The methodology adopted involved the completion of SA stages A, B, C and D and associated tasks as outlined in Figure 2.1. The sections below describe the methodology employed, the findings of which are presented in subsequent sections of this report.

### Stage A: Setting the Context and Objectives, Establishing the Baseline and Deciding on Scope

- 2.3 Scoping work, which built upon initial SA-related work undertaken by SSAG for the whole of Suffolk, was undertaken by BDC in 2007 and revised in 2009. The updated report is available on the Babergh website. The role of this scoping work was to help ensure that the SA covered the key sustainability issues that are relevant to Babergh within the context of the Core Strategy.

### Other Relevant Plans and Programmes

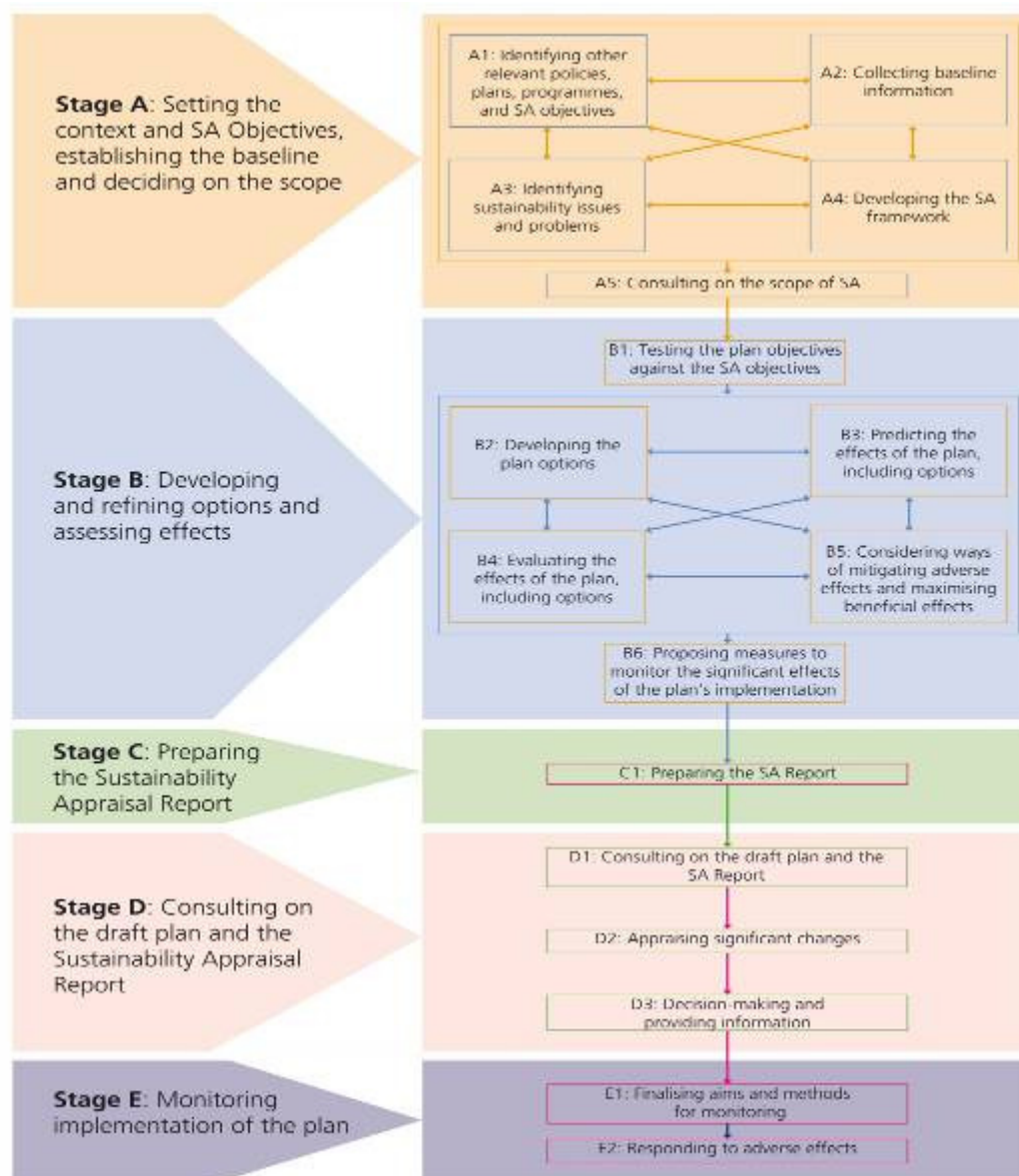
- 2.4 Both the Core Strategy and the SA Scoping Report should be set in the context of national, regional and local objectives along with strategic planning, transport, social, economic and environmental policies. This being the case a comprehensive review of all relevant plans, policies and programmes (PPPs) was carried out as part of the SA scoping process. The review ensures that the objectives in the SA Report generally adhere to, and are not in conflict with, objectives found in other PPPs and also assists in the setting of sustainability objectives for the SA. In addition to this it can also be used to ascertain potential conflicts between objectives which may need to be addressed as part of the process.
- 2.5 The PPPs reviewed included, but not exclusively, those identified by SSAG as likely to affect or influence DPDs, SPDs and LDFs in Suffolk. A list of the PPPs reviewed is included in Section 3. The report with the scoped documents is available on the Babergh website.

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<sup>6</sup> Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

<sup>7</sup> Environmental Assessment of Plans and Programmes Regulations July 2004, which transposed EU Directive 2001/42/EC on assessment of effects of certain plans and programmes on the environment (the 'SEA Directive') into UK law.

Figure 2.1 – Relationship between SA Stages and Tasks



Source: Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents, ODPM, November 2005.

## Baseline Data

- 2.6 To predict accurately how the Core Strategy proposals will affect the environment, social and economic factors, it is important to understand the current state of these factors and then examine their likely evolution without the implementation of the plan.
- 2.7 Baseline information and data are summarised in Section 4. Full baseline datasets can be viewed on the Babergh website where data are listed under social, environmental and economic groupings covering:
- General indicator;
  - Quantified data within the plan area;
  - Comparators and targets (if applicable);
  - Trends (if identified); and



- Source of the information.

2.8 The datasets have been extracted from a wide range of available publications and datasets. Sources have included, among others, baseline data collection undertaken by SSAG, national government and government agency websites, census data, the Office for National Statistics and Annual Monitoring Reports (AMR) produced by BDC. No primary research has been conducted.

## Sustainability Issues

2.9 The key sustainability issues for Babergh were derived by analysing the baseline data and contextual information from other documents and assessing what the significant issues relating to the District are likely to be. The issues outlined in the Scoping Report were identified in a generalised manner. Key issues for the sustainability of the district are outlined in Section 5.

## Sustainability Appraisal Framework

2.10 A framework of objectives, sub objectives, indicators and targets, against which all documents relating to the LDF of Councils in Suffolk can be assessed, was drawn up by the SSAG and informally consulted upon in December 2004/ January 2005. This initial work was developed by BDC, alongside the outcomes of the review of relevant plans and programmes, the evolving baseline and developing analysis of key sustainability issues. Through this work, a draft SA framework was produced. A revised framework was then developed taking on board comments from the consultation on the Babergh SA Scoping Report (2007) The SA Framework is presented in Section 6.

## Consulting on the Scope of the Sustainability Appraisal

2.11 At this stage the Council sought the views of the statutory Consultation bodies, SSAG and others on the scope and level of detail of the ensuing SA Report. A Scoping Report was prepared to that effect in 2007. The consultation results were taken into account and an updated Scoping Report was produced in September 2009, which influenced and helped shape this SA Report (see Babergh website for the Scoping Report).

## Stage B: Developing and Defining Options

### Assessment of Strategic Options

- 2.12 An assessment of the strategic options the Core Strategy was then conducted. The assessment used a broad-brush and qualitative approach, which is generally accepted as good practice by the SA guidance for the earlier strategic stages of the appraisal.
- 2.13 Potential sustainability effects for each of the strategic options were assessed in terms of progress towards achieving the relevant SA objective and sub objective using the scoring system presented in. The assessment was taken, considering likely positive and negative effects of implementation of the option on each SA sub objective in the short, medium and long term as well as secondary, cumulative and synergistic effects. These were summarised in an overall 'rating' score and the nature of the effect and justification of the score provided.

**Table 2.1 –Scoring of Policy Options Assessment**

++	The Option will have a very positive impact on the sustainability objective
+	The Option will have a slightly positive impact on the sustainability objective
0	The Option will have a negligible or neutral impact on the sustainability objective. A recorded neutral effect does not necessarily mean there will be no effect at the project level, but shows that at this strategic level there are no identifiable effects.






–	The Option will have a slightly negative impact on the sustainability objective
--	The Option will have a very negative impact on the sustainability objective
?	The Option impact on an issue is uncertain/cannot be predicted at this stage

- 2.14 The assessment of the Core Strategy options allowed the most and least sustainable aspects of each option to be identified, with the aim of, where necessary, amending the options in order to promote their likely sustainable effects and reduce their likely unsustainable effects. This assessment also informed the selection of options or their aspects are also considered in the Growth Scenarios Core Strategy. Full details can be found on the Babergh website in the SA for the Core Strategy Issues and Options.

## Assessment of Broad Locations

- 2.15 Proposed broad locations for new development were also assessed in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. Existing SA guidance recognises that the most familiar form of SA prediction and evaluation is generally broad-brush and qualitative. It is recognised that quantitative predictions are not always practicable and broad-based and qualitative predictions can be equally valid and appropriate.
- 2.16 For the assessment of the broad locations there was a need to devise location specific SA criteria to cover, for example, accessibility to schools, healthcare facilities and other community services, accessibility to public transport routes, opportunities to promote non-motorised transport modes, identify specific environmental constraints and establish the proposed broad locations' uses. The SA Framework adopted for the assessment of the broad locations is set out in Section 7.
- 2.17 A 'traffic light' assessment scale (shown in Table 2.2) has been used to depict the conformity or non-conformity of each broad location with the criteria outlined below. The strategic level appraisal recognises that all the broad locations offer a degree of flexibility for accommodating development within them and opportunities for overcoming constraints identified. This resulted in fewer negative 'absolutes' (i.e. red colour coding) being attached to the broad locations' scoring. However, the assessment highlights those areas that need to be carefully looked into and addressed during the next planning stage of the sites allocation process so as to avoid and mitigate potential negative effects.
- 2.18 Matrices were used to record likely sustainability effects of each broad location against each criterion. Full details of the sites assessments can be found in Appendix A and a summary of the assessment is presented in Section 7.

**Table 2.2 - Key to Broad Locations Assessment**

	In conformity with the criterion		Not relevant to criterion / Neutral effects
	Partially meets the criterion / possibly in conflict with the criterion/ some constraints identified		Insufficient information is available
	In conflict with the criterion		

## Assessment of Growth Scenarios

- 2.19 The SA Framework, as developed by SSAG and BDC, used to guide the assessment is shown in Table 6.1.
- 2.20 The detailed assessment comprised a systematic two-stage process, described below.



## Prediction of Effects

- 2.21 Using the baseline data and supporting information, the effects of the growth scenarios have been predicted for each of the SA objectives. A six point scale was used to characterise the magnitude of predicted effects in terms of the change to the current baseline. Effects were also characterised in terms of their *geographical extent*, their duration (*short, medium or long term*), whether they are likely to be *temporary* or *permanent*, and the degree of *certainty* with which the prediction was made. Predictions were made using the evidence of the baseline data wherever possible. Short term, medium and long term effects were defined as those predicted to commence within the first five, five to ten and ten or more years of implementation of the Core Strategy, respectively. Appendix B details the scoring scales used to characterise the various features of the predicted effects.
- 2.22 The magnitude of effects was defined in terms of progress towards achieving the relevant SA objective:
- **Major Positive** - likely to result in substantial progress towards the objective
  - **Minor Positive** - likely to result in limited progress towards the objective
  - **Major Negative** - likely to be substantially detrimental to achieving the objective
  - **Minor Negative** - likely to be to the limited detriment of achieving the objective

## Assessment of the Significance of Effects

- 2.23 The effects predicted on each SA objective for the different scenarios were assessed for significance using a simple, systematic process. An assessment score was derived for each objective based on the scores for each effect characteristic (*magnitude, duration, scale, permanence and certainty*) for short, medium and long term effects, using the assessment scale shown in Table 2.3.

**Table 2.3 - Scoring of Growth Options Assessment**

+++	Strongly positive
++	Moderately positive
+	Slightly positive
0	No effect
-	Slightly negative
--	Moderately negative
---	Strongly negative
+/-	Combination of positive and negative effects / neutral effect
n/a	Not assessed

- 2.24 For the purposes of analysing the results of the assessment, significant effects are considered to be those that result in strongly or moderately negative or positive effects.
- 2.25 It should be emphasised that the information quality, and attendant uncertainties and assumptions required to address them, vary across the evidence base for the SA objectives. This has been systematically recorded and taken into account in the detailed appraisal sheets in Appendix B. Thus, where a major effect has been predicted for a particular SA objective, but the evidence base for this contains uncertainties or its interpretation requires a number of assumptions, the measure of information quality recorded in the appraisal has been reduced, and this is reflected in the calculation of the effect significance.
- 2.26 Where effects have been regarded as positive but not significant, minor negative or a mixture of both positive and negative effects, recommendations have been made to improve the potential of these policies to contribute to more sustainable development.

## Secondary and Cumulative Effects Assessments

- 2.27 Annex I of the SEA Directive requires that the assessment of effects include secondary, cumulative and synergistic effects<sup>8</sup>.
- 2.28 **Secondary or indirect effects** are effects that are not a direct result of the plan, but occur away from the original effect or as a result of the complex pathway e.g. a development that changes a water table and thus affects the ecology of a nearby wetland. These effects are not cumulative and have been identified and assessed primarily through the examination of the relationship between various objectives during the prediction of effects.
- 2.29 **Cumulative effects** arise where several proposals individually may or may not have a significant effect, but in-combination have a significant effect due to spatial crowding or temporal overlap between plans, proposals and actions and repeated removal or addition of resources due to proposals and actions. Cumulative effects can be:
- Additive- the simple sum of all the effects;
  - Neutralising- where effects counteract each other to reduce the overall effect;
  - Synergistic– is the effect of two or more effects acting together which is greater than the simple sum of the effects when acting alone. For instance, a wildlife habitat can become progressively fragmented with limited effects on a particular species until the last fragmentation makes the areas too small to support the species at all.
- 2.30 Many environmental problems result from cumulative effects. These effects are very hard to deal with on a project by project basis through Environmental Impact Assessment. It is at the SA level that they are most effectively identified and addressed.
- 2.31 Cumulative effects assessment is a systematic procedure for identifying and evaluating the significance of effects from multiple activities. The analysis of the causes, pathways and consequences of these effects is an essential part of the process.
- 2.32 Cumulative (including additive, neutralising and synergistic) effects have been considered throughout the SA process, as described below:
- As part of the review of relevant strategies, plans and programmes and the derivation of draft SA objectives, key receptors have been identified which may be subject to cumulative effects.
  - In the process of collecting baseline information cumulative effects have been considered by identifying key receptors (e.g. specific wildlife habitats) and information on how these have changed with time, and how they are likely to change without the implementation of the Local Development Framework. Targets have been identified (where possible), that identify how close to capacity the key receptor is, which is a key determining factor in assessing the likelihood of cumulative and synergistic effects occurring, and their degree of significance.
  - Through the analysis of environmental issues and problems, receptors have been identified that are particularly sensitive, in decline or near to their threshold (where such information is available).
  - The development of SA objectives, sub objectives, indicators and targets has been influenced by cumulative effects identified through the process above.
  - The likely cumulative effects of the strategic alternatives have been identified which highlighted potential cumulative effects that should be considered later in the SA process.

<sup>8</sup> ODPM 2006, *A Practical Guide to the SEA Directive*, <http://www.communities.gov.uk/documents/planningandbuilding/pdf/practicalguidesea.pdf>



- Testing the consistency between the Core Strategy and SA objectives has highlighted the potential for cumulative effects against specific Core Strategy objectives.
- Cumulative effects of the scenarios have been predicted and assessed through the identification of key receptors and SA objectives that consider cumulative effects assessment.

## 3. Other Relevant Plans and Programmes

### Introduction

- 3.1 The SEA Directive states that the Environmental Report should provide information on:
- ‘The plan’s relationship with other relevant plans and programmes’ and “the environmental protection objectives, established at international, [European] Community or national level, which are relevant to the plan... and the way those objectives and any environmental considerations have been taken into account during its preparation”.*
- 3.2 A review of all relevant plans and programmes was undertaken. This review was based upon the list of relevant PPPs identified by SSAG and developed for the individual nature of Babergh, and identified the relationships between the SA and plans and programmes which, in turn, has enabled potential synergies to be exploited and, conversely, conflicting initiatives to be identified. Table 3.1 lists the documents reviewed as part of the Core Strategy SA process.

**Table 3.1 – Relevant Plans and Programmes**

<b>International/European Context</b>	
The Johannesburg Declaration on Sustainable Development – Commitments arising from summit (September 2002)	
The UN Millennium Declaration and Millennium Development Goals (September 2000)	
Kyoto Protocol and the UN Framework Convention on Climate Change (May 1992)	
Bern Convention on the Conservation of European Wildlife and Natural Habitats (September 1979)	
Ramsar convention on Wetlands of international importance especially as waterfowl habitat (February 1971)	
Bonn Convention on the Conservation of Migratory Species of Wild Animals (June 1979)	
European Spatial Development Perspective (May 1999)	
Air Quality Framework Directive – 96/62/EC (September 1996) and 2008/50/EC (April 2008)	
Directive to promotion of the use of energy from renewable sources – 2001/77/EC; 2003/30/EC and 2009/28/EC (June 2009)	
Directive for the encouragement of bio-fuels for transport – 2003/30/EC (May 2003)	
Water Framework Directive – 2000/60/EC (October 2000)	
Urban Waste Water Treatment Directive – 91/271/EEC (May 1991)	
Water pollution caused by Nitrates from agricultural sources: Nitrates Directive – 91/676/EEC (December 1991)	
Bathing Water Quality Directive – 76/160/EEC (December 1975) and 2006/7/EC (2006)	
Drinking Water Directive – 98/83/EC (November 1998)	
Strategic Environmental Assessment 2001/42/EC (June 2001)	
Environmental Impact Assessment 85/337/EEC and amended Directive 97/11/EC (March 1997)	
Directive 79/409/EEC on the Conservation of Wild Birds, as amended (April 1979)	

Directive 92/43/EEC on the Conservation of Natural Habitats and of Wild Fauna and Flora (May 1992)
Framework Waste Directive 75/442/EEC, as amended in codified version of 2006/12/EC (April 2006)
Directive 99/31/EC on the landfill of waste (April 1999)
Directive 2008/50/EC on ambient air quality and cleaner air for Europe (June 2008)
Directive 2008/28/EC on the promotion of the use of energy from renewable sources and amending subsequently repealing Directives 2001/77/EC and 2003/30/EC (June 2009)
Packaging and packaging waste directive – 94/62/EC (December 1994)
A New Partnership for Cohesion – Third Report on Economic and Social Cohesion (February 2004) and Draft New Regulations for Renewed Structural Funds (July 2004)
Aarhus Convention (June 1998)
EU Sixth Environmental Action Plan (July 2002)
Waste Incineration Directive 2000/76/EC (December 2000)
End of Life vehicles Directive 2000/53/EC (implemented April 2002)
Waste Electrical & Electronic Equipment Directive 02/96/EC (April 2002)
<b>National, Regional and Local Context (Generic)</b>
<b>National Planning Policy Guidance and Planning Policy Statements</b>
PPS1 – Creating Sustainable Communities (January 05) and Supplement to PPS1 (December 2007) Planning and Climate Change, and supplement to PPS1 – Eco-towns (July 2009)
PPG2 – Green Belts (January 95)
PPS3 - Housing (November 2006)
PPS4 – Planning for Sustainable Economic Growth (December 2009)
PPS5 – Planning for a Historic Environment (March 2010)
Draft PPS – Planning for a Natural and Healthy Environment (March 2010)
PPS7 - Sustainable Development in Rural Areas (August 2004)
PPG8 - Telecommunications (August 2001)
PPS9 – Biodiversity and Geological Conservation (August 2005)
PPS10 – Planning for Sustainable Waste Management (July 2005)
PPS11 - Regional Spatial Strategies (September 2004)
PPS12 – Local Spatial Planning (June 2008)
PPG13 – Transport (April 2001)
PPG14 - Development on Unstable Land (April 1990)
PPG17 – Planning for Open Space, Sport and Recreation (July 2002)
PPG18 – Enforcing Planning Control (December 1991)
PPG19 - Outdoor Advertisement Control (March 2002)

PPG20 – Coastal Planning (September 1992)
PPS22 – Renewable Energy (August 2004)
PPS23 – Planning and Pollution Control (November 2004)
PPG24 – Planning and Noise (September 1994)
PPS25 – Development and Flood Risk (March 2010), and PPS25 Supplement - Development and Coastal Management (March 2010)
MPS 1 - Planning & Minerals (November 2006)
<b>Urban</b>
Urban White Paper (2000)
Towns and Cities Strategy and Action Plan, Urban Renaissance in the East of England (2003)
<b>Rural</b>
Government Rural White Paper: Our Countryside – the future – a fair deal for rural England, DETR (November 2000)
Countryside and Rights Of Way Act (November 2000)
Rural Strategy DEFRA (2004)
<b>Sustainable Communities</b>
The UK Government Sustainability Development Strategy: Securing The Future (March 2005)
Sustainable Communities Plan: Building for the Future (February 2003)
A Sustainable Development Framework for the East of England (October 2001)
Sustainable Communities in the East of England (February 2003)
Securing the Future', the UK Government Sustainable Development Strategy (March 2005)
Creating Sustainable Communities – In the East of England (January 2005)
Embedding Sustainable Development in the East of England (August 2009)
<b>Regional Spatial Strategy</b>
Regional Spatial Strategy – RSS, The East of England Plan (May 2008)
A Revision to the Regional Spatial Strategy for the East of England, Accommodation for Gypsies and Travellers and Travelling Showpeople in the East of England (July 2009)
East of England Plan > 2031 (November 2009)
RSS14 for the East of England SEA Scoping Report (September 2004)
<b>Other Regional Strategies</b>
An Integrated Regional Strategy for the East of England (February 05)
East of England European Strategy 2003 – 2004 (June 2003)
Towards Sustainable Construction – A Strategy for the East of England, (2003)
East of England Implementation Plan – A consultation (April 2009)
Moving to the new Single Regional Strategy (July 2009)

<b>Regeneration</b>
Glemsford, Heritage Economic Regeneration Scheme (2000 – 2003)
Sudbury, Heritage Economic Regeneration Scheme (2003 – 2006)
Anglia Estate, Gt Cornard, Regeneration (2005 -2007)
Sudbury Market Town Partnership (2004)
Pin Mill Regeneration (2006)
Community Energy Project in Sudbury (2000 -2003)
<b>Transport</b>
Aviation White Paper 'The future of air transport' (December 2003)
The Future of Rail, White Paper (July 2004)
The Future of Transport: a network for 2030. White Paper (July 2004)
Government/DfT 10 Year Transport Plan (July 2000)
East of England Regional Transport Strategy (April 2003) (Incorporated as a chapter in RPG14)
Suffolk Local Transport Plan 2006-2011
Local Transport Action Plan for Sudbury and Great Cornard 2006
Local Transport Action Plan for Capel St Mary (2006)
Suffolk Bus Strategy, 2006 – 2011 (March 06)
<b>Community Strategies and Community Development Strategies</b>
Altogether a better Suffolk – Suffolk's Community Strategy (2004)
Suffolk's Community Strategy 2008 to 2028 (June 2008)
Western Suffolk Local Strategic Partnership: Community Strategy 2006 to 2016 (2006)
Babergh East Local Strategic Partnership – Community Plan 2005-2008 and 2008 to 2010 (July 2005)
<b>Suffolk Structure Plan</b>
Suffolk Structure Plan – 2001 This has been replaced by the East of England Plan with the exception of a few saved policies
<b>Neighbouring Authority and National Park Local Plans/Local Development Documents</b>
Mid Suffolk District Council, Adopted Core Strategy (September 2008)
St Edmundsbury Borough Council, Submission Core Strategy (January 2010)
Ipswich Borough Council, Proposed Submission Core Strategy (September 2010)
Suffolk Coastal District Council, Core Strategy and Development Management Policies (Pre Submission Document) (March 2010)
Tendring District Council, Issues and Options Core Strategy (May 2009)
Braintree District Council, Submission Draft Core Strategy (February 2010)
Colchester Borough Council, Adopted Core Strategy (December 2008)

Babergh District Council, Strategic Plan 2008 – 2018
Babergh 5 year Capital Strategy (2007)
Public Service Agreements 2008 -2011
Suffolk County Council Corporate Plan 2006/08
Local Area Agreement: Suffolk 2005-2008
Suffolk County Council Policy and Performance Plan 2005/6
Best Value Performance Plan for Babergh, 2003/2004
Babergh Local Plan (2006)
Pathfinder Strategy Babergh (2007)
<b>Social – National, Regional and Local Context</b>
<b>Social Inclusion</b>
Regional Social Strategy for the East of England (May 2004)
Race equal scheme – Action plan for 2004 -2006
Social Inclusion and Community Cohesion Strategy for Suffolk (2008-2010)
Suffolk County Council Equalities Policy (April 2003)
Youth Strategy for Babergh (June 2004)
<b>Health</b>
White Paper: Choosing Health: Making healthy choices easier (Nov 2004)
Healthy Futures A Regional Health Strategy for the East of England 2005 – 2010 (May 2006)
Social Care Annual Plan 2003-2004
Joint Strategic Needs Assessment for Suffolk 2008 – 2011 (December 2007)
NHS Plan (March 2000)
Suffolk Health Improvement Plan 2001/2002 (June 2001)
Local Health Improvement Plan (November 2002) and Healthy Ambitions (June 2008)
<b>Culture</b>
A Better Life: The role of culture in the sustainable development of the East of England (EERA, September 2006)
Culture: a catalyst for change. A Strategy for Cultural Development for the East of England, Living East (June 2004)
A Cultural Strategy for Suffolk (March 2002)
District Cultural Strategy – Babergh, 2001-2006
<b>Education</b>
School Organisation Plan 2006 – 2011 (August 2006)
Suffolk Children and Young Peoples Plan 2006–2009 and 2009 - 2011
Suffolk's Strategy for Learning 2004-2009: The Single Educational Plan (March 2004)



<b>Housing</b>
Regional Housing Strategy for the East of England 2005-2010 (July 2005) and The East of England Housing Statement - People, Places, Homes: Priorities for Housing and Regeneration in the East of England 2010-2014
Affordable Housing Study: The Provision of Affordable Housing in the East of England 1996-2021 (2003)
East of England Affordable Housing Study Stage 2: Provision for Key workers and Unmet Housing Need (2005)
Suffolk Supporting People Five Year Strategy 2005-2010 (August 2005) and Refreshed Strategy (Update 2008)
ODPM Circular 01/2006: Planning for Gypsies and Travellers (January 2006)
Code for Sustainable Homes: A step-change in sustainable home building practice (Communities and Local Government, 2006) and (February 2008)
Babergh Housing Strategy 2004 - 2009
Babergh Homelessness Review and Strategy 2003
Babergh Housing Needs Surveys, 2004 and 2008
Babergh Housing Supply and demands analysis, 2004
Ipswich Housing Market Area, Strategic Housing Market Assessment 2008
<b>Community Safety</b>
Suffolk Community Safety Strategy, 2001 and Suffolk Community Safety Partnership 2007-2009
Babergh Crime Reduction Partnership, Babergh Community Safety Strategy 2002-2005; 2005 -2008 and Strategic Action Plan 2009-2010
Crime and Disorder Reduction Partnership Strategy 2005-2008
<b>Environmental - National, Regional and Local Context</b>
<b>Environmental Strategies</b>
Environment, Our future: Regional Environment Strategy for the East of England, East of England Regional Assembly and East of England Environment Forum (July 2003)
<b>Soil</b>
Farming and Food Strategy, Facing the Future, DEFRA, (December 2002) and Food 2030 Strategy (January 2010)
The First Soil Action Plan for England: 2004 – 2006 (2004) and Safeguarding our Soils, A Strategy for England (Defra 2009)
Contaminated Land Strategy, Babergh District Council (April 2009)
<b>Open Space</b>
Draft Study of Existing Outdoor Playing Space for Children within Babergh District Council, 2004
<b>Climate</b>
Climate Change – UK Programme, 2006 (March 06)

Defra's Climate Change Plan (March 2010)
Living with Climate Change in the East of England – summary Report supported by technical report (2003)
Nottingham Declaration on climate change (October 2000)
Building a Greener Future: Towards Zero Carbon Development (DCLG) (December 2006)
<b>Air Quality</b>
National Air Quality Strategy for England, Wales, Scotland and Northern Ireland (January 2000) and the updated strategy (July 2007)
Report on the updating and screening assessment of Air Quality in the Babergh District (July 2003)
<b>Water</b>
Water Framework Directive – Initial Advice to Local Planning Authorities in England and Wales (Environment Agency) (February 2006) and Water for life and livelihoods: River Basin Management Plans Anglian Water Basin District (December 2009)
North Essex Catchments Flood Management Plan (December 2009) and
East Suffolk Catchments' Flood Management Plan, Managing Flood Risk (December 2009)
Babergh DC Strategic Flood Risk Assessment (2009)
Water for people and the environment: Water resources strategy – Regional action plan for Anglian Region (Environment Agency) (December 2009) and Water resources Strategy for the England and Wales (March 2009)
Suffolk Shoreline Management Plan (January 2010)
<b>Biodiversity and Nature Conservation</b>
The UK Biodiversity Action Plan (1994)
Working with the Grain of Nature: A Biodiversity Strategy for England (October 2002)
Butterfly Conservation – Regional Action Plan for Anglia (June 2000)
Circular 06/2005 (ODPM): Biodiversity and Geological Conservation – Statutory obligations and their impact on the planning system (August 2006)
BSI PAS 2010 (September 2006)
Wildlife and Countryside Act (1981, as amended)
Suffolk Local Geodiversity Action Plan (Draft March 2006)
State of Nature-Lowlands-future landscapes for wildlife (February 2004)
Suffolk Biodiversity Action Plan, being Updated (2000 - 2007)
<b>Countryside Management</b>
Dedham Vale AONB and Stour Valley Management Strategy 2004-2009; and Management Plan 2010-2015
Suffolk Coast and Heaths AONB Management Plan 2008 -2013
The Stour and Orwell Estuaries: Scheme of management and management strategy 2005 (2010)

Suffolk Countryside Strategy
Babergh Countryside Strategy, (unpublished 1997)
Greenways Countryside Project, Management Strategy 2005 – 2010 (2005)
'In step with Suffolk' Rights of Way Improvement Plan 2006 -2016 (SCC) (2006)
<b>Woodland</b>
A Strategy for England's Trees, Woods and Forests (DEFRA 2007)
Woodland for Life: The Regional Woodland Strategy for the East of England (November 2003)
<b>Minerals and Waste</b>
Suffolk Minerals Local Plan Adopted May 1999
Regional Waste Management Strategy (2002)
MPS 1 – Planning and Minerals (November 2006)
Suffolk Waste Local Plan (February 2006)
Suffolk Waste Submission Core Strategy (December 2009)
Joint Municipal Waste Management Strategy for Suffolk (October 2003)
<b>Economic - National, Regional and Local Context</b>
<b>Economic and Employment Strategies</b>
Regional Economic Strategy for the East of England – A Shared Vision (Nov 2004)
Prioritisation in the East of England (June 2003)
Regional Emphasis Document SR2004 (December 2003)
Framework for Regional Employment and Skills Action (FRESA) (2003)
International Business Strategy, Consultation Draft (December 2003)
Suffolk Rural Action Plan (March 2006)
Expanding Suffolk's Horizons: 2004-7 – A New Economic Strategy for Suffolk (2004)
Economic Development Programme 2006/07-2008/09
<b>Tourism</b>
Regional Tourism Strategy 2008-2010
Tomorrows Tourism Today (August 2004)
Good Practice Guide on Planning for Tourism (DCLG) (May 2005)
Sustainable Tourism Strategy for the East of England (March 2004)
<b>Sport</b>
East of England Plan For Sport (2004)

## Review

- 3.3 A review of most of the above documents can be seen on the following website:  
<http://www.babergh.gov.uk/Babergh/Home/Planning+and+Building+Control/Local+Development+Framework/Sustainability+Appraisal+and+Strategic+Environment+Assessment+%28For+Core+Strategy%29.htm>
- 3.4 The above mentioned documents were reviewed in terms of the following:
- Document name and reference points;
  - Key objectives, targets and indicators relevant to the LDF and the SA;
  - Implications for the Plan; and
  - Implications for SA.

## 4. Baseline

### Introduction

- 4.1 The SEA Directive says that the Environmental Report should provide information on:

*‘relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan’ and the “environmental characteristics of the areas likely to be significantly affected”; and*

*‘any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC’.*

- 4.2 In addition to the requirements of the SEA Directive, the statutory SA process requires the collection of additional information on social and economic characteristics of the plan area.

### Baseline Data Collection

- 4.3 Baseline information provides the foundation for predicting and monitoring effects and helps to identify sustainability problems and alternative ways of dealing with them. Sufficient information about the current and likely future state of the plan area is required to allow the plan’s effects to be adequately predicted.
- 4.4 The baseline information was gathered around the sustainability topics identified through previous work undertaken by the SSAG on developing a SA framework of objectives and sub objectives. The SSAG workgroup refined and adapted relevant social, environmental and economic baseline information previously gathered for the ‘Suffolk’s Environment ... towards sustainable development’ report in order to produce a characterisation of the area which sets out baseline data, targets, past trends and issues regarding sustainability. A complete baseline report covering Suffolk as a whole and each district in Suffolk is available and was used in the collection of the baseline data for this SA.
- 4.5 The Babergh SA Scoping Report sets out social, environmental and economic data which were updated in the Final Scoping Report and are reproduced below. The Scoping Report contains a list of the baseline indicators that were gathered. These indicators will be employed to measure the effects of implementation of the Core Strategy, thus forming a key part of the overall monitoring programme for the implementation of the LDF.
- 4.6 It should be noted that not all the information was readily available and some measures have been taken to collect the information for future reference.

### Baseline Information

#### Social Baseline Information and Analysis of Trends

- 4.7 Babergh had a population of 83,461 in 2001 and was estimated at 87,000 in mid-2008<sup>9</sup>; with 34,862 households (2001 census). A significant percentage of the population are considered to be ‘older people’ (males over 65 and females over 60), with approximately 24%<sup>10</sup> of the population within this category (19.1 % in 2004, Suffolk Observatory).

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<sup>9</sup> <http://www.statistics.gov.uk/statbase/product.asp?vlnk=15106>

<sup>10</sup> <http://www.statistics.gov.uk/statbase/product.asp?vlnk=15106>

- 4.8 Babergh consists of an area of 59,378 hectares. The district has 76 parishes and 25 wards (see Figure 1.2). Babergh District is mainly classified as countryside, and has two market towns: Sudbury and Hadleigh. Of the 76 villages, 15 are considered to have key services and facilities within them and are classified as 'sustainable villages' in the Local Plan (2006). For planning purposes, part of the Ipswich Policy Area falls within the Babergh district.
- 4.9 Based on the 2001 Census figures, of the households in Babergh, 5,500 do not own a car (16%) but a significant proportion of households own 2 or more cars. Affordable housing, particularly for new forming households, is a major issue in the Babergh District, according to the Babergh District Housing Needs Survey, 2004 with average house and flat prices having risen by 109% and 110% respectively, since 2000. Since 2004 the price rises to 2008 have been less with an overall increase of 34.5% according to the Land Registry. In February 2007 (2008 figures in brackets) the average price of a detached house sold in the district was £318,791 (£326,928) and the price for a semi-detached house was £185,392, (208,554) for a terraced house £169,816, (£166,214) and flats/maisonettes £101,051 (£ 130,101).
- 4.10 There are also pockets of social deprivation in the district along with small areas where the health of the residents is notably worse than in the county or district as a whole. It is important not to overlook these areas in the evaluation process otherwise inequalities are likely to increase. A summary analysis of the social baseline information contained in the baseline report is provided in the table below.

**Table 4.1 – Social Sustainability Issues**

Objective	Impact/ Progress	Sustainability Issue
<b>Health</b>	😊 😐	No sustainability issues other than the number of people killed and seriously injured in road traffic accidents, which need to be reduced. Figures for Babergh however are below the average for Suffolk. There are however small areas where people have poor health, particularly in parts of Sudbury and Gt Cornard, which cause concern.
		Improved monitoring of data for change in playing space is needed.
<b>Education</b>	😊	No sustainability issues. Figures for educational levels are similar or higher than the average for Suffolk.
<b>Crime and anti-social activity</b>	😊 😞	The crime figures for Babergh are relatively low for Suffolk. Crime rates and fear of crime have increased in the last number of years. However the vast majority of people feel safe in the area where they live.
		Noise complaints have increased in the last few years.
		In relation to national figures these are still relatively low rates.
<b>Poverty</b>	😊	No sustainability issues presently experienced. Figures for Babergh are lower than those for Suffolk. In general, however, there are a few areas which cause concern.
<b>Access to services</b>	😐 😞	There has been a rapid decrease in the number of people who have access to a wide range of rural services within their own village. With the area predominantly rural in nature, access to public transport and services are important issues to consider. The use of the car for the school run is increasing which is contrary to the county trend.

Objective	Impact/ Progress	Sustainability Issue
		Monitoring of access to key local services and food shops, new retail space and access to childcare places is improving.
<b>Employment</b>	😊	Unemployment rate is low. Similar levels to average for Suffolk.
	😐 😞	The proportion of lone parents and long term-ill who are economically active as well as the average earnings could affect sustainability in the district
<b>Housing</b>	😞 😐	Homelessness, housing stock, housing land availability, housing types and sizes, average property prices are all sustainability issues that have been identified (the housing needs survey indicated housing types and sizes as well as affordability were serious issues within district)
		Monitoring of special needs housing and the number of unfit homes can be improved. The definition of special needs housing needs further work.
<b>Quality of life</b>	😐	No sustainability issues have been identified but monitoring of data needs to be improved. Higher percentage of residents very satisfied with their neighbourhoods as a place to live than in Suffolk as a whole.
		Monitoring of the area of land managed for ecological interest with public access needs to be improved.

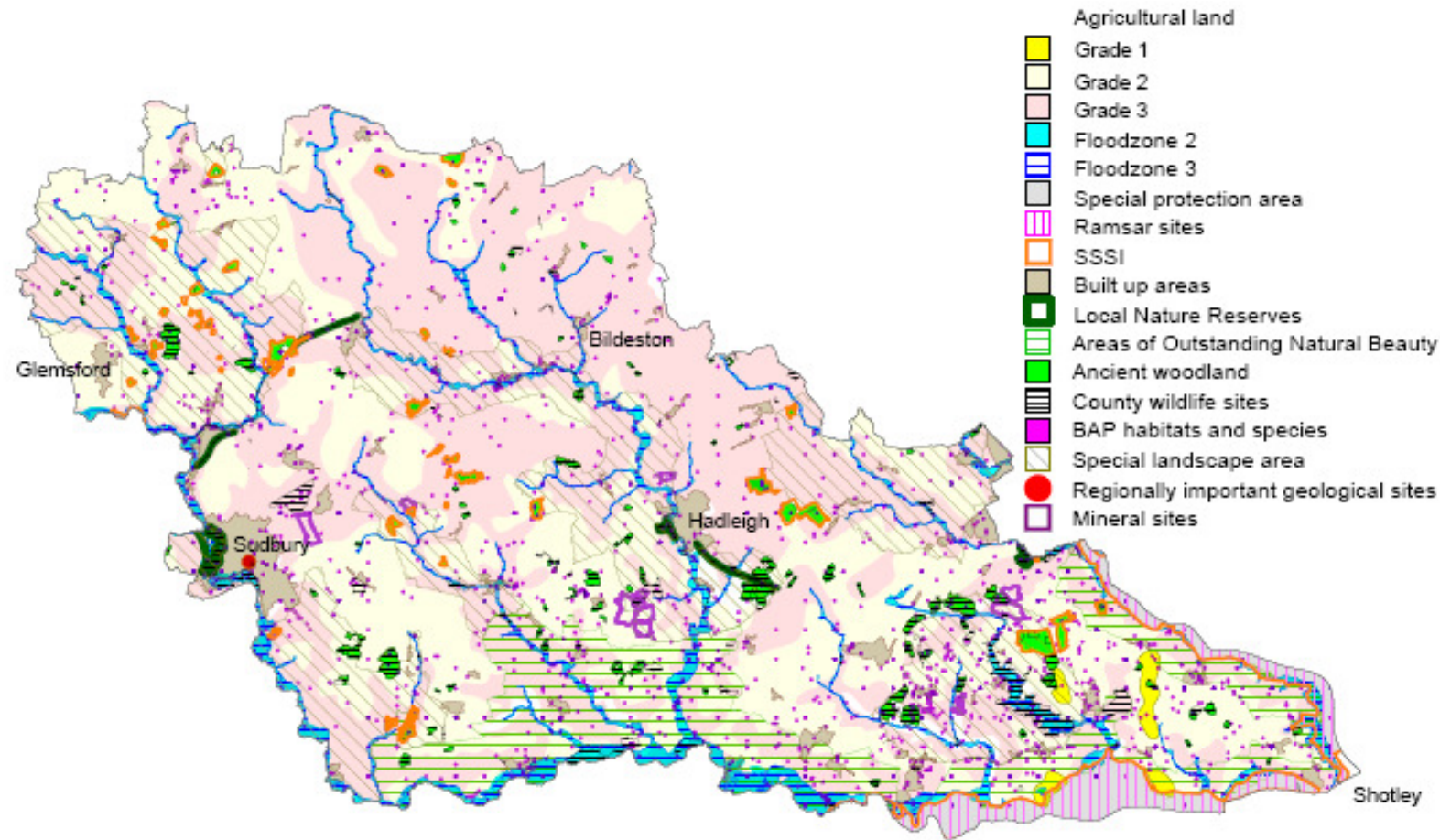
KEY: 😊 = Good progress/positive trend/on target. 😐 = Mixed progress/unable to determine trend.  
😞 = Poor progress/negative trend/below target

## Environmental Baseline and Analysis of Trends

- 4.11 Conserving the natural and historic environment in Babergh is considered a key issue for the district with its wealth of important and varied natural habitats including grassland, woodland, rivers, estuarine mudflats, saltings, etc. Many of these habitats have their importance recognised by various national, international, county and local designations. A large part of the district is classified as countryside and is under threat from changes in farming practices, new and existing development, visitor pressure, traffic generation and a lack of appropriate management, although large areas are part of countryside management schemes.
- 4.12 Babergh District supports two towns and several villages recognised nationally as being of exceptional architectural, historical or environmental quality. There are 28 designated conservation areas in Babergh and nearly 4000 buildings are listed as being of Special Architectural or Historical Interest.
- 4.13 Figure 4.1 and Figure 4.2 show key natural and built environment assets of the district.



Figure 4.1 - Map of the Natural Environment of Babergh District



Constraints Map: Natural Environment

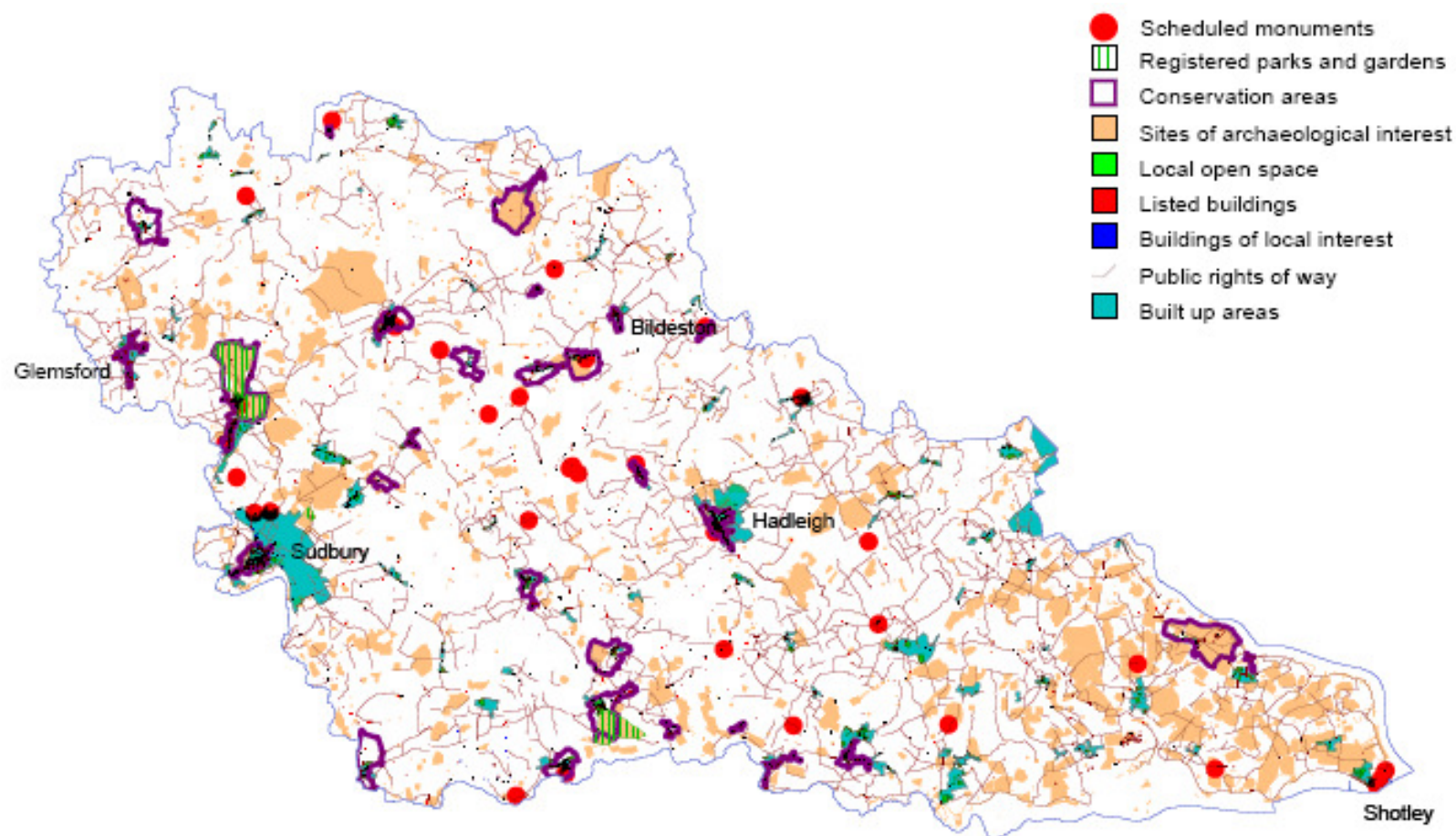


SCALE 1:200000

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Figure 4.2 - Map of the Built Environment of Babergh District



## Constraints Map: Built Environment



SCALE 1:200000

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- 4.14 A summary of the analysis of the environmental baseline information contained in the baseline report is provided in the table below.

**Table 4.2 – Environmental Sustainability Issues**

Objective	Impact/ Progress	Sustainability Issue
<b>Water and Air Quality</b>	😊 😐	Generally no sustainability issues regarding air quality although monitoring of locations along A12 and Sudbury town centre does have one Air Quality Management Zone due to traffic.
		No information available on Water Quality and monitoring of these indicators has to be improved.
<b>Soil</b>	😊	No sustainability issues; monitoring of indicators has to be improved for rehabilitation and use of contaminated sites.
<b>Water and mineral resources</b>	😊 😐	No sustainability issues regarding the use of minerals.
		No information available on sustainable use of water and monitoring of these indicators has to be improved
<b>Reduce waste</b>	😊 😐	No sustainability issues, household and municipal waste levels are being reduced. Rates are lower than for Suffolk. Work still needs to be done in some areas of recycling.
<b>Traffic</b>	😞 😐	Sustainability issues – steadily rising traffic levels, amount of development taking place in major towns has decreased in some years (but this may change in the future) and there is also a decrease in rural service provision, this has led to increased car usage. The car is also heavily used for the school run counter to the Suffolk trend. Monitoring of indicators has to be improved. The situation does not compare favourably with those in the rest of Suffolk. Babergh has the second highest proportion of households with 3 or 4 cars in Suffolk in the 2001 Census.
		Monitoring of distances to key services, can be improved.
<b>Reducing contributions to climate change</b>	😞 😐	Sustainability issues – gas consumption increasing and few energy efficiency schemes planned.
		Monitoring of energy efficiency of homes needs to be improved.
<b>Vulnerability to climate change</b>	😊 😐	Monitoring has to be improved of properties at risk of flooding from rivers and the sea, incidence of fluvial flooding and coastal flooding. Although it is not believed that there are large numbers.
<b>Biodiversity</b>	😐 😞	In terms of area affected, the Stour and Orwell river estuaries are in a declining condition dominate the condition of ecological SSSI's. Monitoring of reported conditions of SSSIs, achievement of the Species Action Plan targets, development proposals affecting selected BAP habitats is improving but bird survey results are not detailed enough to reach a conclusion.
<b>Historical and archaeological areas</b>	😊 😐	No sustainability issues but monitoring of data needs to be improved.
		There may need to be more appraisals of Conservation

Objective	Impact/ Progress	Sustainability Issue
		Areas.
<b>Landscapes and townscapes</b>	☹️ 😊	The area of land designated as 'environmentally sensitive areas' has decreased, but other schemes have taken over and there has been an increase in the number of schemes overall as well as the area covered. The quality of the landscape as assessed through the landscape character assessment process has identified an improvement in the quality of the landscape features for the 2 character areas affecting Babergh.
		The number of village greens and commons, light pollution and monitoring the number of planning applications refused for reasons of poor design could to be improved but the latter is probably a poor indicator.

KEY: 😊 = Good progress/positive trend/on target. ☹️ = Mixed progress/unable to determine trend.  
☹️ = Poor progress/negative trend/below target

## Economic Baseline and Analysis of Trends

- 4.15 In 2008, 1.7% of the population were unemployed, compared to 1.1% the previous year. This is low compared with the Suffolk rate of 2.2%, which has increased from 1.6% in 2007 (Suffolk Data Observatory). The overall rate in Great Britain was higher still, at 2.8% in 2008.
- 4.16 The Babergh District Council Employment Land Study identified that Babergh has a diverse economy with a strong manufacturing sector, a declining agricultural base, and a tourism industry with significant growth potential. The business base is characterised by a high proportion of micro-businesses (employing 0 - 4 employees) with rates of business formation, in terms of VAT registrations slightly below the County average. The stock of businesses has increased in the District since the mid-1990s, indicating to some extent that the District remains attractive as a business location. It is important that the District becomes less reliant on the existing major companies and continues to nurture SMEs in sectors of growth potential such as ICT, business services and tourism.
- 4.17 Babergh has had a shortage of employment land, which has pushed land prices up. There is also a shortage of commercially attractive buildings available for immediate occupation. Research showed that the overall rating of Babergh as a business location was very positive. New employment land has been allocated in Hadleigh and Sudbury as well as on the Ipswich fringe and other locations to meet the identified local need.
- 4.18 In the context of Suffolk, Babergh has a comparatively small amount of industrial, warehouse and office floorspace reflecting its local and sub-regional economic role. Babergh has 29% of the potential general industry floorspace, no potential office floorspace, 22% of the potential high tech floorspace, no potential starter floorspace, and 2% of the potential storage floorspace in Suffolk. There appears to have been a lack of available start-up space, expansion space and opportunities for the development of any new employment locations. The importance of the provision of rural workspace has been identified in the study and the provision of local employment opportunities has been encouraged through the provision of workspace proposals in sustainable villages within the Local Plan.
- 4.19 According to 2001 Census figures 2,572 of the residents that work in the district travel to work by public transport and 27,977 travel to work by car, motorcycle or van. The average distance travelled to a fixed place of work is 17.45 miles. This emphasises the need for a continued focus on sustainable development reducing the need to travel.

Table 4.3 – Economic Sustainability Issues

Objective	Impact/ Progress	Sustainability Issue
<b>Prosperity and economic growth</b>	😊 😐	Positive trends in percentage change in the total number of registered businesses in the area, although the new business formation rates are low. Unemployment is very low in relation to national and Suffolk figures.
<b>Revitalise town centres</b>	😊 😞	Proportion of town centre units with A1 uses has decreased, however the vacant units in the town centres have also decreased.
<b>Efficient movement patterns and growth</b>	😐	The proportion of people who travel to work by sustainable modes of transport is below the county average and does not appear to be improving. To confirm this trend may not be possible until the next census. This may be due to the rural nature of the district but it has not reduced the district's attraction to investors.
		Monitoring of locally sourced products stocked by major supermarkets has to be improved.
<b>Indigenous and inward investment</b>	😊 😐	There is considerable interest both from within Suffolk and from outside the area, including international interest in investing in Babergh. There is currently (2006) high demand for employment floorspace within Babergh particularly from indigenous firms seeking to expand their businesses locally. The demand for leased premises is however limited.

KEY: 😊 = Good progress/positive trend/on target. 😐 = Mixed progress/unable to determine trend.  
😞 = Poor progress/negative trend/below target

## 5. Key Sustainability Issues

### Introduction

- 5.1 The identification of the key sustainability issues most relevant to the Core Strategy has been undertaken through the review of relevant plans and programmes documented in Section 3, an analysis of baseline indicators set out in Section 4, key issues identified throughout the development of and likely to be addressed by the Core Strategy and work completed by the SSAG workgroup.

### Results

- 5.2 Table 5.1 details the key sustainability issues to be addressed by the Core Strategy.

**Table 5.1 – Key Sustainability Issues**

No.	Key Issue	Description	Relevant SEA Topic
1	Role of market towns and urban fringe in the district	There are two market towns of Sudbury and Hadleigh in the district. They include the largest concentration of population in the district and provide a range of services and facilities to large rural catchment areas including employment, retail, leisure, health and education, other community facilities and physical infrastructure to support these. The towns in the Babergh district are of particular importance to the future vitality and viability of the district. The district also includes a part of the urban fringe of Ipswich, an important urban area that provides for most of the key services in this part of the district.	Population, Material Assets, Landscape
2	Rural character, the importance of towns and larger villages and access to services and facilities	Babergh is predominantly rural in character with many small villages that have limited services and facilities. These smaller villages depend on the larger villages and town centres in the district to provide for many of their day-to-day needs. It is important that the services and facilities of the villages in the district are safeguarded as well as recognising the important role of larger villages in the district.	Population, Material Assets, Cultural Heritage, Landscape
3	Improve sustainability and 'self-containment'	In a rural area such as Babergh it is difficult to achieve a reduction in car travel, as for many people in small villages/ countryside public transport will not replace the need to own and run a car. We need to look at reducing the need to travel by ensuring new development is located close to services and facilities and that these developments are carefully planned to provide opportunities for work and leisure etc. close to new homes.	Human Health, Air, Climatic Factors
4	Limited brownfield	The rural character of and settlement pattern of Babergh, with only 2 market towns (of limited	Soil, Landscape



No.	Key Issue	Description	Relevant SEA Topic
	land	size) and a part of the Ipswich fringe built up area, mean that the supply of brownfield land for re-development within the district is very limited. The prioritisation of brownfield land development has caused some problematic issues in the Babergh district, as it has led to significant pressure to redevelop the district's scarce employment land supply for residential redevelopment. The re-use of brownfield land has to be carefully considered to ensure the sustainable development of the district and achieving a balance between social, economic and environmental issues in the district.	
5	Ageing population	The population in Babergh, as is generally the case elsewhere in the country, is an ageing population. This places pressure on local health services and other services as well as underlining the importance of ensuring that the needs of the elderly population are addressed.	Population, Human Health
6	Need for affordable housing	Income in relation to house prices continues to mean that affordability in the district remains a problem and that there is a large need for affordable housing throughout the district.	Population, Human Health, Material Assets
7	Need to sustain the economy and achieve the right balance between highly skilled and low skilled jobs	Babergh is an economically diverse area, and economic activity rates in Babergh compare favourably with national and regional levels. It is important that we sustain and promote the economy in the district particularly since a large proportion of the workforce work outside of the district. Income rates and the level of highly qualified inhabitants are below regional and national averages and it is necessary for us to improve the balance between highly skilled and low skilled jobs in the district.	Material Assets
8	Strengths of the economy	It is important to recognise the drivers of our local economy and our existing strengths, and identify the potential for future new businesses and employment opportunities in the district.  The ports of Felixstowe and Harwich, whilst not within the district, are major economic drivers for Babergh and are providers of jobs for many Babergh residents. The ports could also potentially benefit Babergh's economy through related employment generating development within the district, and the improved infrastructure which comes along with this.  The attractive landscape, estuaries, and coastline, and the historic towns and villages in the district form the base of an important cultural and historic leisure and tourism sector. Businesses in this sector are important contributors to the local economy. There is also a significant agricultural base in the	Material Assets



No.	Key Issue	Description	Relevant SEA Topic
		district.	
9	Climate change	CO <sub>2</sub> levels of emissions in the Babergh District are above regional and national levels. In addition the East of England region is particularly vulnerable to the effects of climate change. It is therefore important that we look at ways to contribute to reducing climate change in the district.	Human Health, Air, Climatic Factors
10	Exceptional natural, historic and built environments	The district has a varied and attractive landscape, including several areas of importance to nature conservation. The district also has a prestigious historic environment, of outstanding character and quality. The value of the natural and built environment in the District forms the basis for a strong local tourism industry. It is important that we protect and enhance the natural, historic and built environments in the Babergh District, whilst planning for growth.	Biodiversity, Flora and Fauna, Soil, Water, Cultural Heritage, Landscape
11	Infrastructure constraints	New development should be supported by appropriate infrastructure to ensure that our communities are sustainable and healthy. It is therefore important that infrastructure needs are considered together with how new development will be accommodated in the district.	Material Assets



## 6. Sustainability Appraisal Framework

### Introduction

- 6.1 The SA Framework is a key component in completing the SA through synthesising the baseline information and sustainability issues into a systematic and easily understood tool that allows the assessment of effects arising from the implementation of the Core Strategy in key areas through progress towards the achievement of a number of objectives and sub objectives. Although the SEA Directive does not specifically require the use of objectives or indicators in the SEA process, they are a recognised and useful way in which social, environmental and economic effects can be evaluated and compared at key stages of the Strategy's development.
- 6.2 The SA Framework comprises a list of objectives and sub objectives. Progress toward achieving these objectives will be measured using the corresponding indicators. The purpose of the SA Framework is to provide a set of criteria against which the performance of the Core Strategy can be predicted and evaluated.

### Babergh District Council Core Strategy SA Framework

- 6.3 An SA Framework has been developed using an iterative process, starting from the initial work undertaken by SSAG and developed following the review of relevant plans and programmes, the evolving baseline, analysis of key sustainability issues and consideration of which of these issues can potentially be addressed by the Core Strategy.
- 6.4 The SA Framework developed for the Babergh Core Strategy includes a series of carefully selected indicators which have been extracted and modified where necessary from the framework of indicators produced by SSAG, and from existing SSAG monitoring, in order to provide a clarification of the intended interpretation of each objective. The early indicators produced by the SSAG workgroup are set out in the Scoping Report. Sub objectives, indicators and targets have been developed as part of the SA framework and link to the baseline data.
- 6.5 The objectives chosen for Babergh District are tailored to its unique set of environmental, social and economic characteristics and the issues raised through the assessment and analysis of baseline information. Each objective is chosen for its desired effect as an outcome rather than a means of reaching that outcome. For example 'to reduce the amount of traffic on the roads' would be an overall objective and one means to achieve the objective would be to 'encourage more people to use public transport'.
- 6.6 The objectives are set out to cover the wide range of social, economic and environmental issues of sustainability and serve to identify how far the Core Strategy is addressing issues of sustainable development by facilitating the identification of potential conflicts between the aims for reaching sustainability and the approach set out in the DPD.
- 6.7 The updated SA Framework includes 23 objectives as shown in Table 6.1 below.
- 6.8 Additionally, SSAG undertook a compatibility assessment of the SA framework objectives against themselves, in order to identify the key areas of possible conflict. A matrix detailing the results of this assessment is set out in Section 7.

Table 6.1 – SA Framework

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
<b>Social Objectives</b>				
1	To improve the <b>health</b> of the population overall	Will it improve access to high quality, health facilities?	Proportion of population with access to hospital or GP or dentist surgery (DfT accessibility indicators - define access)	Population, Human Health
		Will it reduce death rates?	Overall death rate by all causes (PCT)	
			Cancer deaths (malignant neoplasms) under 75 per 100,000 population (PCT)	
			Ischaemic Heart Disease deaths under 75 per 100,000 population (PCT)	
			Respiratory disease deaths (all ages) per 100,000 population (PCT)	
			Deaths from self harm and injury undetermined (all ages) per 100,000 population (PCT)	
			Number of people killed and seriously injured in road traffic accidents per 100,000 population (SCC)	
			Life expectancy (SDA)	
		Will it encourage healthy lifestyles?	Proportion of journeys to work on foot or by cycle (Census/SCC)	
			How do children travel to school? (QOL/BVPI)	
			Obesity in the population (PCT)	
			Change in existing provision of outdoor playing space (youth and adult space) (District open space assessments)	
			Change in existing provision of children's play space ((District open space assessments)	
			Change in provision of open space (District open space assessments)	
			The % of total length of footpaths and other rights of way which are easy to use by members of the public (BVPI)	
			Change in amount of accessible natural green space (Natural England Standards)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
2	To maintain and improve levels of <b>education</b> and skills in the population overall	Will it improve qualifications and skills of young people?	Proportion of Year 11 pupils gaining 5+ A*-C grades at GCSE (District Wide SDA / BVPI)	Population, Material Assets
			Average point score per student at A and AS Level (District Wide SDA / BVPI)	
		Will it improve qualifications and skills of adults?	Proportion of the population with no qualifications (Census)	
			Proportion of the population with NVQ level 4 or higher (District Wide SDA)	
3	To reduce <b>crime and anti-social activity</b>	Will it reduce actual levels of crime?	Recorded Crime per 1000 population (SSAG/ SDA/ Nomis)	Population, Material Assets, Human Health, Air
			Burglary Rate (SDA)	
			Violent Crime Rate (SDA)	
		Will it reduce fear of crime?	Fear of Crime (QOL, Suffolk Speaks, British Crime Survey)	
		Will it reduce noise and odour concerns?	Number of noise complaints (Environmental Health Depts Districts)	
			Number of odour complaints (Environmental Health Depts Districts)	
4	To reduce <b>poverty and social exclusion</b>	Will it reduce poverty and social exclusion in those areas most affected?	Proportion of the population who live in wards that rank within the most deprived 10% and 25% of wards in the country (SCC)	Population, Human Health, Material Assets
			Housing benefit recipients (LAs)	
5	To improve <b>access to key services</b> for all sectors of the population	Will it improve accessibility to key local services?	Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)	Population, Material Assets
			Proportion of population with access to key local services (eg GP, post office) (DfT accessibility indicators)	
		Will it improve accessibility to shopping facilities?	New Retail Floor Space in Town Centres (AMR/ Health Checks)	
			Proportion of population with access to a food shop (DfT accessibility indicators) – (those living within 30 minutes of key services by public transport)	
		Will it improve access to child care?	Number of child care places per thousand children under 5 (SCC)	
6	To offer everybody the	Will it reduce unemployment overall?	Unemployment rate (SSAG/AMR)	Population, Human

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
	opportunity for rewarding and satisfying <b>employment</b>	Will it reduce long-term unemployment?	Long term unemployment (Nomis)	Health, Material Assets
		Will it provide job opportunities for those most in need of employment?	Proportion of lone parents and long term-ill who are economically active (Census)	
		Will it help to improve earnings?	Average Earnings (Inland revenue/AMR)	
7	To meet the <b>housing</b> requirements of the whole community	Will it reduce homelessness?	Homelessness (districts homelessness presentations)	Population, Human Health, Material Assets
		Will it provide enough housing	Housing Stock (SSAG)	
			Housing Land Availability (SSAG)	
		Will it increase the range and affordability of housing for all social groups?	Affordable Housing (SSAG)	
			Special Needs Housing	
			Housing Types and Sizes (SSAG)	
			Dwellings per hectare of Net Developable Area (SSAG)	
			Average property price to income ratio (SSAG)	
		Will it reduce the number of unfit homes?	Number of unfit homes per 1,000 dwellings (BVPI) (decent homes standard for LA/housing stock)	
8	To improve the quality of where people live and to encourage <b>community participation</b>	Will it improve the satisfaction of people with their neighbourhood as a place to live?	% of residents who are happy with their neighbourhood as a place to live (Suffolk Speaks/ODPM QOL surveys)	Population, Human Health
		Will it increase access to natural green space?	Area of land managed in whole or part for its ecological interest and with public access over and above public rights of way (SCC)	
			Areas of deficiency in terms of natural green space (SCC)	
			Change in amount of accessible natural green space (Natural England standards)	
		Will it encourage engagement in decision making?	Electoral turnout in local authority elections	
			Number of Parish Plans adopted (Suffolk Acre)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
		Will increase the number of people involved in volunteer activities?	Number of people involved in volunteer activities (SCC/CVS)	
		Will it improve ethnic relations?	Number / rate of racist incidents (Racial Harassment Initiative)	
		Will it improve access to cultural facilities?	Number of visits to/uses of Council funded or part- funded museums per 1,000 population (BVPI 170a)	
			Number of visits to Council funded or part- funded museums that were in person, per 1,000 population (BVPI 170b)	
			The number of pupils visiting museums and galleries in organised school groups (BVPI 170c)	
<b>Environmental Objectives</b>				
9	To maintain and where possible improve <b>water</b> quality	Will it improve the quality of inland waters?	Water quality in rivers (EA)	Human Health, Water
			Groundwater quality (may be available from EA in future - CAMS)	
		Will it improve the quality of coastal waters?	Water quality in estuaries (EA)	
			Bathing water quality (EA)	
10	To maintain and where possible improve <b>air</b> quality	Will it improve air quality?	Have annual mean concentrations of any of 3 pollutants been exceeded (Annual Air Quality Report)	Human Health, Air, Climatic Factors
			Number of Air Quality Management Areas and dwellings affected (SSAG)	
11	To conserve <b>soil</b> resources and quality	Will it minimise the loss of greenfield land to development?	Number and percentage of new dwellings completed on greenfield land (AMR)	Human Health, Soil
			Number and percentage of existing housing commitments on greenfield land (SSAG)	
			Dwellings per hectare of net developable area (SSAG)	
		Will it minimise loss of the best and most versatile agricultural land to development?	Allocations on best and most versatile agricultural land (grades 1, 2, and 3) (AMR)	
		Will it maintain and enhance soil quality?	Number and area of potential and declared contaminated land returned to beneficial use (Districts / EA)	
			Number / area of organic farms (Natural England/ Soil Association)	



No	Headline Objective	Sub-Objective	Indicator	SEA Topic
12	To use <b>water</b> and mineral resources efficiently, and re-use and recycle where possible	Will it promote sustainable use of minerals?	Recycled aggregate production (SSAG)	Human Health, Water
		Will it promote sustainable use of water?	Water consumption data (Environment Agency)	
		Will it maintain water availability for water dependant habitats?	Water availability for water dependant habitats (Wetland Habitat Working Group)	
13	To reduce <b>waste</b>	Will it reduce household waste?	Household (and municipal) waste produced (SSAG)	Population, Human Health, Material Assets
		Will it increase waste recovery and recycling?	Tonnage / proportion of household (and municipal) waste recycled, composted and landfilled (SSAG / BVPI / PSA)	
14	To reduce the effects of <b>traffic</b> on the environment	Will it affect traffic volumes?	Traffic volumes in key locations (SCC)	Population, Human Health, Air, Climatic Factors
		Will it reduce the need for local travel?	Percentage of all new residential development taking place in major towns, other towns, and elsewhere (SSAG)	
			Percentage of rural population living in parishes which have a food shop or general store, post office, pub, primary school and meeting place (SSAG)	
			Distance to key services (new accessibility indicators from DfT)	
		Will it increase the proportion of journeys made using modes other than the private car?	Percentage of journeys to work undertaken by sustainable modes (SSAG)	
			Percentage of schoolchildren travelling to school by sustainable modes (BVPI)	
			Car parking standards (SSAG)	
15	To reduce emissions of <b>greenhouse gases</b> from energy consumption	Will it reduce emissions of green house gases by reducing energy consumption?	Consumption of electricity - Domestic use per consumer and total commercial /industrial use (Dept for Business, Innovation and Skills)	Population, Human Health, Air, Climatic Factors
			Consumption of gas - Domestic use per consumer and total commercial /industrial use(Dept for Business, Innovation and Skills)	
			Energy efficiency of homes (BVPI 63 / HECA)	
		Will it increase the proportion of energy needs being met by renewable sources?	Installed electricity generating capacity using renewable energy (SSAG)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
16	To reduce <b>vulnerability to climatic</b> events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	Flood risk - planning applications approved against Environment Agency advice (SSAG)	Population, Human Health, Climatic Factors
			Properties at risk of flooding (EA)	
			Incidence of fluvial flooding (properties affected) (EA)	
		Will it minimise the risk of flooding to people and property on the coast?	Incidence of coastal flooding (properties affected) (EA)	
		Will it reduce the risk of coastal erosion?	Developments refused because of risk of coastal erosion (SSAG)	
		Will it reduce the risk of damage to people and property from storm events?	Incidence of flood watches and warnings (EA)	
17	To conserve and enhance <b>biodiversity and geodiversity</b>	Will it maintain and enhance sites designated for their nature conservation and/or geological interest?	Change in number and area of designated ecological sites (SSAG)	Biodiversity, Flora and Fauna, Landscape
		Will it avoid disturbance or damage to protected species and their habitats?	Reported condition of ecological SSSIs (Natural England)	
			Development proposals affecting protected species outside protected areas (SWT)	
		Will it help deliver the targets and actions for habitats and species within the Suffolk Biodiversity Action Plan?	Achievement of Habitat Action Plan targets (SBRC/SBP)	
			Achievement of Species Action Plan targets (SBRC/SBP)	
			Development proposals affecting selected BAP habitats outside protected areas (SWT)	
		Will it help to reverse the national decline in farmland birds?	Bird survey results (BTO/RSPB)	
		Will it protect and enhance sites, features and areas of geological value in both urban and rural areas?	Number and area of geological SSSIs and RIGs (Natural England)	
			Reported condition of geological SSSIs and RIGs (Natural England)	
18	To conserve and	Will it protect and enhance sites,	Area of historic parks and gardens (SSAG)	Cultural





No	Headline Objective	Sub-Objective	Indicator	SEA Topic
	where appropriate enhance areas of <b>historical</b> and <b>archaeological</b> importance	features and areas of historical and cultural value in both urban and rural areas?	Number and area of Conservation Areas and Article 4 directions (SSAG)	Heritage
			Number of Conservation Area Appraisals completed and enhancement schemes implemented (SSAG)	
			Number of listed buildings and buildings at risk (SSAG)	
		Will it protect and enhance sites, features and areas of archaeological value in both urban and rural areas?	Number of Scheduled Ancient Monuments (SAMs) damaged as a result of development (SSAG)	
			Planning permissions affecting known or potential archaeological sites (SSAG)	
19	To conserve and enhance the quality and local distinctiveness of <b>landscapes and townscapes</b>	Will it reduce the amount of derelict, degraded and underused land?	Number and percentage of new dwellings completed on previously developed land (SSAG)	Landscape, Cultural Heritage
			Number and percentage of existing housing commitments on previously developed land (SSAG)	
			Number of vacant dwellings (Babergh Council Tax Records)	
		Will it improve the landscape and/or townscape?	Changes in the landscape (WI landscape survey) (SSAG)	
			Number / area of town / village greens and commons (SCC)	
			Area of designated landscapes - AONB, Environmentally Sensitive Areas (CA/ DEFRA)	
			Number of Environmentally Sensitive Area / Countryside Stewardship / Environmental Stewardship schemes (DEFRA)	
			Light pollution (CPRE)	
			Number of planning applications refused for reasons due to poor design (AMR)	
Economic Objectives				
20	To achieve sustainable levels of prosperity and <b>economic growth</b> throughout the plan area	Will it improve business development and enhance competitiveness?	Take-up of employment floorspace (SSAG)	Material Assets
			Employment permissions and allocations (SSAG)	
			Net percentage change in the total number of VAT registered businesses in the area (SDA / Suffolk Observatory)	
			Change in number of businesses paying business rates (NNDR)	

No	Headline Objective	Sub-Objective	Indicator	SEA Topic
			Business formation rate (0% new VAT registrations as a % of total VAT registered stock) (SDA/Suffolk Observatory)	
		Will it improve the resilience of business and the economy?	Number and percentage of employees by employment division (SSAG)	
			Business start ups and closures (Suffolk Observatory)	
			Number and percentage of businesses by main industry type (AMR)	
			Number an percentage of businesses by size (number of employees) (AMR)	
		Will it promote growth in key sectors?	Number and percentage of businesses by industry type in key sectors (SSAG / AMR)	
		Will it improve economic performance in advantaged and disadvantaged areas?	Comparative industrial and office rental costs within the plan area (CLG/Estate Agents)	
		Will it encourage rural diversification?	Employment permissions and allocations in rural areas (SSAG)	
			Planning consents for B1, B2 and B8 in rural areas ((LAs)	
21	To revitalise <b>town centres</b>	Will it increase the range of employment opportunities, shops and services available in town centres?	Proportion of town centre units with A1 uses (SSAG)	Material Assets
		Will it decrease the number of vacant units in town centres?	Vacant units in town centres (SSAG)	
22	To encourage efficient patterns of movement in support of <b>economic growth</b>	Will it reduce commuting?	Distances travelled to work for the resident population (Census/SCC data)	Material Assets
			Employment permissions and allocations in urban areas (SSAG)	
			Number / percentage of people working from home (Census; SCC data)	
			Percentage of households with broadband and internet connection	
		Will it improve accessibility to work by public transport, walking and	Number of developments where a travel plan is submitted or is a condition of development	



No	Headline Objective	Sub-Objective	Indicator	SEA Topic
		cycling?	(SSAG)	
			Percentage of journeys to work undertaken by sustainable modes (SSAG)	
		Will it reduce journey times between key employment areas and key transport interchanges?	Indicator only relevant for Ipswich but not considered suitable for Suffolk as a whole.	
		Will it increase the proportion of freight transported by rail or other sustainable modes?	Proportion of port freight carried by rail (Port Authorities / AMR)	
		Will it increase the consumption of locally produced food and goods?	Number of farmers markets and farm shops (LAs)	
23	To encourage and accommodate both <b>indigenous</b> and inward investment	Will it encourage indigenous business?	Number of enquiries to business advice services (business link, LAs)	Material Assets
		Will it encourage inward investment?	Number of enquiries to Suffolk Development Agency (Suffolk Development Agency/ LA / SCC)	
		Will it make land available for business development?	Employment land availability (SSAG)	
			Employment permissions and allocations (SSAG)	

## 7. Broad Locations Assessment

### Introduction

- 7.1 Nine broad locations for new development identified in the Growth Options Core Strategy document have been subject to an assessment in order to determine their performance in sustainability terms, with reference to social, environmental and economic factors. These locations represent urban extensions of Sudbury (4 broad locations), Hadleigh (3 broad locations) and Ipswich (two broad locations) as shown on the Key Diagram.
- 7.2 The rationale used for the broad locations assessment, the assessment results and a discussion of the relative merits and disadvantages of the broad location options identified, highlighting the most and least sustainable options, are set out below.

### Assessment Framework

- 7.3 The methodology for the Broad Locations Assessment is explained in Section 2. This section gives further explanation relating to the specific framework used for the assessment of the strategic locations for the implementation of the Core Strategy.
- 7.4 Existing SA guidance recognises that the most familiar form of SA prediction and evaluation is generally broad-brush and qualitative. It is recognised that quantitative predictions are not always practicable and broad-based and qualitative predictions can be equally valid and appropriate.
- 7.5 The assessment has been based on following information and tools:
- Maps of each broad location, provided by the Council;
  - Index of Multiple Deprivation, Suffolk Results, Suffolk County Council, January 2008;
  - Natural and Built Environmental Constraints maps, provided by the Council;
  - Environment Agency (EA) flood risk maps ([www.environment-agency.gov.uk](http://www.environment-agency.gov.uk));
  - Google Earth maps in order to gain an aerial view of the broad locations, to assess broad locations' accessibility, their position within the local landscape, and to ascertain distances to the nearest settlements and local services and facilities, as well as the availability of the latter;
  - Multi-Agency Geographic Information for the Countryside ([www.magic.gov.uk](http://www.magic.gov.uk)) constraints maps for Agricultural Land Classification (ALC) and statutory designations; and
  - Natural England England's interactive mapping website ([www.natureonthemap.org.uk](http://www.natureonthemap.org.uk)) for ecological designations and Biodiversity Action Plan (BAP) Priority Habitats; and
  - Babergh District Council Preliminary Review (Stage 1) of Issues and Options Core Strategy Report (March 2009) to inform the Habitats Regulations Assessment, October 2009.
- 7.6 For the assessment of the broad locations there was a need to devise location specific SA criteria to cover, for example, accessibility to schools, healthcare facilities and other community services, accessibility to public transport routes, opportunities to promote non-motorised transport modes, identify specific environmental constraints and establish the proposed broad locations' uses. Table 7.1 below presents the SA Framework adapted for the assessment of the broad locations including decision-making criteria and indicators and indicating the conformity/non-conformity assessment scale for each indicator considered.
- 7.7 Three SA objectives have been excluded from the original SA framework devised during the scoping stage of the SA/SEA, as the indicators developed to measure the progress in achieving

these objectives, were deemed to be beyond the sphere of influence of the broad locations' allocation process. These objectives are as follows:

- Objective 3: To reduce crime and anti-social activity;
- Objective 11: To use water and mineral resources efficiently, and re-use and recycle where possible; and
- Objective 12: To reduce waste.

Table 7.1 - Broad Locations Assessment Framework

SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
<b>Social</b>				
1	To improve the health of the population overall	Is there adequate access to health facilities?	Is it within 30 mins of a GP, dentist and hospital by public transport?	Yes / Restricted / No
		Will it encourage healthy lifestyles?	Will it lead to a loss of public open space or open access land?	Possibly / No
			Will it improve accessibility by Public Rights of Way?	Yes / No
2	To maintain and improve levels of education and skills in the population overall	Will it improve qualifications and skills of young people?	Is it within 30 mins of a school by public transport?	Yes / Restricted / No
			Is it within walkable/cyclable distances (800m and 2-5km) to a school?	Yes / Restricted / No
4	To reduce poverty and social exclusion	Will it reduce poverty and social exclusion in those areas most affected?	Will the broad location be adjacent or within LSOAs in the most deprived 20% to 40% in the country?	Yes / No
5	To improve access to key services for all sectors of the population	Will it improve accessibility to key local services?	Is it within 30 mins of the town centre by public transport?	Yes / Restricted / No
			Is it within walkable/cyclable distances (800m and 2-5km) to key services?	Yes / Restricted / No
		Will it improve accessibility to shopping facilities?	Is it within 30 mins of a supermarket/ shopping centre by public transport?	Yes / Restricted / No
			Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?	Yes / Restricted / No
		Will it improve accessibility and decrease the need of travel?	Is the broad location proposed for mixed-use development with good accessibility to local facilities?	Yes / No
6	To offer everybody the opportunity for rewarding and satisfying employment	Will it reduce the unemployment overall?	Is the broad location proposed for employment or mixed use with employment included?	Yes / No

SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
7	To meet the housing requirements of the whole community	Will it increase the range and affordability of housing for all social groups?	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that broad locations which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5 hectares or more in size, capable of accommodating at least 15 dwellings, or on broad locations of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.	Yes / No
8	To improve the quality of where people live and encourage community participation	Will it increase access to natural green space?	Is the broad location proposed in an area with accessible natural green space?	Yes / No
<b>Environmental</b>				
9	To maintain and where possible improve water quality	Will it avoid development in areas protected for water quality reasons?	Is the broad location proposed within a groundwater source protection zone?	Yes (the whole location within zone 1 - Inner protection) / Partially or within zones 2 and 3/ No
10	To maintain and where possible improve air quality	Will it improve air quality?	Is the broad location proposed within an Air Quality Management Area (AQMA)?	Yes / Partially / No
11	To conserve soil resources and quality	Will it minimise the loss of Greenfield land to development?	Is the broad location proposed on Greenfield land?	Yes / Partially / No
		Will it minimise the loss of the best and most versatile agricultural land to development?	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?	Yes / Partially / No
		Will it maintain and enhance soil quality?	Will it lead to remediation of contaminated land?	Yes / No
14	To reduce the effects of traffic on the environment	Will it decrease the need for local travel?	Does the broad location have good accessibility to local facilities (as assessed above)?	Yes / Partially / No



SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
15	To reduce emissions of greenhouse gases from energy consumption	Will it increase the proportion of energy needs being met by renewable sources?	Will the broad location proposal promote the incorporation of small-scale renewable in developments?	Yes / No
16	To reduce vulnerability to climatic events	Will it minimise the risk of flooding to people and property from rivers and watercourses?	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?	Yes / Partially / No
17	To conserve and enhance biodiversity and geodiversity	Will it maintain and enhance sites designated for their nature conservation interest?	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.	Yes - the Location within 4km of European site and 2km of SSSI/ Location is within 4km of SSSI/ No
			Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.	Yes - the whole Location within 500m of designation/Part of the location is within 500m/ No
		Will it avoid disturbance or damage to protected species and their habitats?	Are BAP habitats known to be represented within the broad location?	Yes - predominant portion of Location contains BAP habitats / Smaller parts of Location contain BAP habitats/ No

SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
		Will it protect and enhance sites, features and areas of geological value?	Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites). The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.	<b>Yes - the whole Location within 500 m /Part of the location within 500m or 1 km /No</b>
18	To conserve and where appropriate enhance areas of historical and archaeological importance	Will it protect and enhance sites, features and areas of historical and cultural value?	Are there any listed buildings on or adjacent to the broad location?	<b>Yes / No</b>
			Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criteria) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.	<b>Yes / Partially or in Proximity/ No</b>
			Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.	<b>Yes / Partially on in Proximity/ No</b>
			Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.	<b>Yes / Partially or in Proximity/ No</b>
		Will it protect and enhance sites, features and areas of archaeological value?	Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.	<b>Yes - the whole Location falls within such area/ Partially or located in Proximity/ No</b>

SA Objective		Decision Making Criteria	Indicator	Conformity/Non-conformity
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	Will it improve the landscape or townscape?	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.	Yes / No
			Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?	Yes / Partially and Adjacent / No
			Will the broad location development lead to coalescence of urban extensions with nearby villages?	Yes / No
Economic				
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	Will it improve business development and enhance competitiveness?	Is the broad location proposed for mixed-use development or employment?	Yes / No
21	To revitalise town centres	Will it increase the range of employment opportunities, shops and services available in town centres?	Is the broad location proposed for mixed-use development or employment in town centres?	Yes / No
22	To encourage efficient patterns of movement in support of economic growth	Will it improve accessibility to work by public transport, walking and cycling?	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?	Yes / No
23	To encourage and accommodate both indigenous and inward investment	Will it make land available for business development?	Will it increase employment land availability?	Yes / No

Note: For some criteria/indicators, the whole range of possible effect is not applicable, as they represent just negative or positive screening criteria.

## Assessment Results

- 7.8 Table 7.2 below sets out a summary of the assessments results for the broad locations proposed for development. Appendix A provides more detailed assessment results for each broad location.
- 7.9 The broad locations have been found to perform with a comparable level of positive effects against a number of the SA objectives. Although the assessment against these objectives does not allow for differentiation between the broad locations due to the level of detail available, it highlights the areas where the development of the broad locations would generate positive sustainability effects. The SA objectives concerned are:
- Objective 7 - *To meet the housing requirements of the whole community.* As all the broad locations will accommodate substantial numbers of housing, including affordable housing, they are expected to benefit this SA objective.
  - Objective 6 - *To offer everybody the opportunity for rewarding and satisfying employment.* All the broad locations would be capable of accommodating larger sites and it is likely that these sites will be expected to provide a mix of uses, including employment and community facilities, which should provide new employment opportunities in the area.
  - Objective 15 - *To reduce emissions of greenhouse gases from energy consumption.* The size of all the broad locations will allow for development proposals to incorporate the required proportion of energy from decentralised and renewable or low-carbon sources.
  - Objectives 20 and 23 - *To achieve sustainable levels of prosperity and economic growth throughout the plan area; to encourage and accommodate both indigenous and inward investment.* All the broad locations are deemed to be equally beneficial against these economic objectives through the accommodation of employment and mixed uses and ensuring an adequate provision of this type of land use for the future development in the District; also refer to explanation in Objective 6.
- 7.10 All the broad locations perform well against the social SA objectives mainly as a result of their good accessibility by public transport to the key services and facilities, including health care facilities, schools, employment, supermarkets and shopping areas. Broad locations 2, 3 and 9 perform the best in terms of accessibility, potentially providing walkable access to the key services and facilities. Good levels of accessibility reflect the urban extension nature of all the broad locations. All the broad locations also have a good access to natural green space which may stimulate social mixing and interaction, benefiting SA objective 8 (*encourage community participation*). Development within broad location 6 in the east of Sudbury may also provide regeneration opportunities, as it is partially situated in the area with higher deprivation levels (amongst 40% of most deprived Lower Super Output Areas in the country), delivering benefits against SA objective 4 (*poverty and social exclusion*).
- 7.11 The assessment against the SA environmental objectives provides the most differentiation between the broad locations. Flood constraints have been identified for parts of broad locations 2, 3, 4 and 9, which mainly relates to river bodies crossing the locations.
- 7.12 Broad locations 1, 3, 4, 6, 7 and 9 were found to be situated in proximity (within 2km or 4km distance) to SSSI sites designated for their ecological value. Broad location 8 and 9 (Ipswich fringe) is situated in proximity not only to the SSSI but also to the European site, a Special Protection Area.
- 7.13 Parts of broad locations 2, 3 and 4 lie within urban Conservation Areas. Broad locations 6 and 8 are adjacent to the Historic Parks and Gardens. One Scheduled Monument is located within broad location 2 and another is adjacent to broad location 5. All the broad locations contain sites of archaeological interest. Their size is comparatively small to the size of the broad locations, apart from broad location 3 where sites of archaeological interest occupy a significant area within

the location. All the broad locations apart from locations 1, 5 and 6 also have some degree of landscape constraints being adjacent or located within the Special Landscape Areas and Environmentally Sensitive Areas.

- 7.14 All the broad locations perform equally well against the SA economic objectives as a result of accommodating employment and other uses and providing good and encouraging efficient patterns of movement in support of economic growth as outlined above.
- 7.15 Overall, broad location 5, north of Sudbury, is deemed to perform the best in sustainability terms, as it has fewer environmental constraints compared to all other locations. Broad location 6, east of Sudbury, even though being located in relative proximity to SSSI, is also rated well overall in sustainability terms. Broad location 1, east of Hadleigh, is associated with comparatively lower level of constraints as well.
- 7.16 The results of the assessment indicate that broad locations 2 and 9, west of Hadleigh and South West Ipswich Fringe, perform least favourable overall in sustainability terms, having the highest number of the environmental constraints. Broad location 4, west of Sudbury, is also significantly constrained.
- 7.17 The rest of the broad locations (locations 3, 6, 7 and 8) have a comparable level of constraints identified. However, it is believed that the size of each of the broad locations offers the potential for avoiding or mitigating most of the possible negative effects. The findings of this assessment and of the forthcoming HRA Screening will need to inform the future site allocations process.

Table 7.2 - Summary of Assessment Results for Broad Locations

SA Objective and Indicator		Hadleigh - Broad Location 1	Hadleigh - Broad Location 2	Hadleigh - Broad Location 3	Sudbury - Broad Location 4	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
<b>Social</b>										
1	Is it within 30 mins of a GP, dentist and hospital by public transport?									
	Will it lead to a loss of public open space or open access land?									
	Will it improve accessibility by Public Rights of Way?									
2	Is it within 30 mins of a school by public transport?									
	Is it within walkable/cyclable distances (800m and 2-5km)?									
4	Will the broad location be situated near or within LSOAs in the most deprived 20% to 40% in the country?									
5	Is it within 30 mins of the town centre by public transport?									
	Is it within walkable/cyclable distances (800m and 2-5km) to key services?									
	Is it within 30 mins of a supermarket/ shopping centre by public transport?									
	Is it within walkable/cyclable distances (800m and 2-5km) to supermarkets/shopping centre?									
	Is the broad location proposed for mixed-use development with good accessibility to local facilities?									
6	Is the broad location proposed for employment or mixed use with employment included?									



SA Objective and Indicator		Hadleigh - Broad Location 1	Hadleigh - Broad Location 2	Hadleigh - Broad Location 3	Sudbury - Broad Location 4	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
7	Is the broad location proposal over the relevant thresholds for the application of affordable housing policy? Babergh Local Plan policy HS08 specifies that sites which come forward for residential development in a settlement with a population of 3,000 or more and which are 0.5 hectares or more in size, capable of accommodating at least 15 dwellings, or on sites of similar size and capacity on which a renewal of planning permission is sought, the District Council will require up to 35% of dwellings to be provided in the form of affordable housing to meet identified local needs.									
8	Does the broad location have a good access to natural green space?									
<b>Environmental</b>										
9	Is the broad location proposed within a groundwater source protection zone?									
10	Is the broad location proposed within an Air Quality Management Area (AQMA)?									
11	Is the broad location proposed on Greenfield land?									
	Would it lead to the loss of best and most versatile agricultural land (Grade 1, 2 and 3a)?									
	Will it lead to remediation of contaminated land?									
14	Does the broad location have good accessibility to local facilities (as assessed above)?									
15	Will the broad location proposal promote the incorporation of small-scale renewable in developments?									
16	Does the broad location lie within the flood risk zones (2, 3a, 3b) identified in the SFRA and have a proposed 'non-compatible' use or is located within 9m of a river?									



SA Objective and Indicator		Hadleigh - Broad Location 1	Hadleigh - Broad Location 2	Hadleigh - Broad Location 3	Sudbury - Broad Location 4	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
17	Is the broad location in proximity to a Special Protection Area (SPA), Special Area of Conservation (SAC) or broad location of Special Scientific Interest (SSSI)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 2-4 km of a SPA, SAC or SSSI. Differentiation is made between European and national designations given a different level of protection granted to these sites.									
	Is the broad location in proximity to a County Wildlife Site, Local Nature Reserve or Ancient Woodland? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 500m of a site.									
	Are BAP habitats known to be represented within the broad location?									
	Would it lead to a loss of or damage to a designated geological site - SSSI or RIGS (Regionally Important Geological/Geomorphological Sites). The broad location within 500m of a SSSI will be coded red and within 1km will be coded amber. The broad location adjacent to RIGS will be coded red and within 500m - amber.									
18	Are there any listed buildings within or adjacent to the broad location?									
	Is the broad location in or adjacent to a Conservation Area? Note: The broad locations located in a Conservation Area were coded red, those within 40 metres of a town Conservation Area or within 800m of a village Conservation Area (a PPG2 criterion) were coded orange and broad locations not in proximity to any Conservation Areas were coded green.									
	Is the broad location in or adjacent to a Historic Park and Garden? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Historic Park and Garden.									

SA Objective and Indicator		Hadleigh - Broad Location 1	Hadleigh - Broad Location 2	Hadleigh - Broad Location 3	Sudbury - Broad Location 4	Sudbury - Broad Location 5	Sudbury - Broad Location 6	Sudbury - Broad Location 7	Ipswich Fringe - Broad Location 8	Ipswich Fringe - Broad Location 9
	Does the broad location contain or it is adjacent to a Scheduled Ancient Monument (SAM)? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a SAM.									
	Does the broad location fall within or it is adjacent to an Area of Archaeological Importance or a potential archaeological site? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of an Area of Archaeological Importance or a potential archaeological site.									
19	Do parts of the broad location cover or they are adjacent to a Green Corridor? Note: For the purposes of this assessment, proximity will be taken to mean that the broad location is within 40m of a Green Corridor.									
	Is the broad location in or adjacent to areas of designated landscapes (AONB, Environmentally Sensitive Areas)?									
	Will the broad location development lead to coalescence of urban extensions with nearby villages?									
<b>Economic</b>										
20	Is the broad location proposed for mixed-use development or employment?									
21	Is the broad location proposed for mixed-use development or employment in town centres?									
22	Is the broad location proposed in a proximity to a public transport route or in a walkable/cyclable distance?									
23	Will it increase employment land availability?									

## 8. Growth Scenarios

### Introduction

- 8.1 This chapter summarises the SA of the Babergh Core Strategy Growth Scenarios and this includes 8 Growth Scenarios, four for housing growth and four for employment growth.
- 8.2 The SA Framework, as developed by SSAG and BDC, used to undertake the assessment is shown in Table 6.1. Further detail relating to the scoring methodology for assessment is included in Section 2.
- 8.3 The results of the detailed appraisal of the potential effects predicted to arise as a result of the implementation of the Core Strategy Scenarios are included in Appendix B. The section below presents an analysis of the detailed appraisal in terms of the significance of direct effects and potential cumulative effects and recommendations for improving the sustainability of the policies.

# Results of the Assessment of the Growth Scenarios

8.4 Appendix B presents the results of the detailed appraisal of the potential effects of the Core Strategy Growth Scenarios predicted to arise from their implementation. The section below presents an analysis of the detailed appraisal in terms of the significance of direct effects and recommendations for improving the sustainability of the policies. Suggestions for mitigation of adverse effects or enhancement of positive ones are also set out. Table 8.1 presents a summary of the significance of direct effects from the detailed appraisal.

**Table 8.1 - Summary of Significance of Direct Effects of Growth Options**

SA Objective		Housing				Employment			
		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 1	Scenario 2	Scenario 3	Scenario 4
1	To improve the health of the population overall	+	+	+	+	+	+	+	+
2	To maintain and improve levels of education and skills in the population overall	++	0	0	0	+	++	++	+
3	To reduce crime and anti-social activity	+	+	+	+	+	+	+	+
4	To reduce poverty and social exclusion	++	++	+	+	+	++	++	+
5	To improve access to key services for all sectors of the population	++	++	+	+	+	++	++	+
6	To offer everybody the opportunity for rewarding and satisfying employment	+++	0	0	0	++	+++	++	++
7	To meet the housing requirements of the whole community	++	+++	+	+	0	0	0	++
8	To improve the quality of where people live and to encourage community participation	+	+	+	+	+	+	+	+
9	To maintain and where possible improve water quality	-	-	-	-	-	-	-	-
10	To maintain and where possible improve air quality	-	-	-	-	-	-	-	-
11	To conserve soil resources and quality	---	---	-	-	-	---	--	-

SA Objective		Housing				Employment			
		Scenario 1	Scenario 2	Scenario 3	Scenario 4	Scenario 1	Scenario 2	Scenario 3	Scenario 4
12	To use water and mineral resources efficiently, and re-use and recycle where possible	-	-	-	-	-	-	-	-
13	To reduce waste	-	-	-	-	-	-	-	-
14	To reduce the effects of traffic on the environment	-	---	-	-	-	-	-	-
15	To reduce emissions of greenhouse gases from energy consumption	--	---	-	-	-	--	--	-
16	To reduce vulnerability to climatic events	-	-	-	-	-	-	-	-
17	To conserve and enhance biodiversity and geodiversity	--	---	-	-	-	--	--	-
18	To conserve and where appropriate enhance areas of historical and archaeological importance	-	-	-	-	-	-	-	-
19	To conserve and enhance the quality and local distinctiveness of landscapes and townscapes	-	-	-	-	-	-	-	-
20	To achieve sustainable levels of prosperity and economic growth throughout the plan area	+++	0	0	0	++	+++	+++	+
21	To revitalise town centres	++	0	0	0	++	+++	++	+
22	To encourage efficient patterns of movement in support of economic growth	+++	0	0	0	++	+++	+++	+
23	To encourage and accommodate both indigenous and inward investment	+++	0	0	0	++	+++	++	+

## Assessment Summaries and Recommendations

### Housing Scenarios

#### Scenario 1: Balancing housing and economic growth

- 8.5 It is predicted that this scenario will have a number of moderate to significantly positive effects against the SA objectives. Provision of higher numbers of housing developments will seek to address housing needs. This scenario is based on balancing housing growth with economic growth and it is predicted that it will improve

access to key services such as employment, reduce poverty and social exclusion, improve educational skills and achieve economic growth in the district.

- 8.6 Moderately significant negative effects are predicted against SA objective 11, 15 and 17. Objective 11 seeks to protect soil resources and moderately negative effects are predicated and quantity due to the large amount of greenfield land to be developed over the plan period. Objective 15 seeks to reduce emissions of greenhouse gases from energy consumption and objective 17 seeks to conserve and enhance biodiversity in the district. High growth levels are predicted to impact on energy consumption and biodiversity.

## Recommendations

- 8.7 Although only one significantly negative effect was predicted from the assessment of the policies in this component, a number of recommendations to improve performance of this scenario towards the achievements of the SA objectives are made below. More detail will emerge once the distribution and location of growth and the implications of this are considered as part of the Core Strategy preparation process and what effects this will have on the environment and environmental objectives.
- 8.8 It is recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted including:
- The effects of development on water quality and local air quality should be considered and how any negative impacts can be mitigated;
  - The provision of sustainable transport infrastructure and planting/greening to provide increased pollution sequestration should be considered and other ways of reducing the effects of traffic on the environment including ensuring that new sites for development should be within accessible distances to services and facilities and should be integrated with the green infrastructure network;
  - Inclusion of policies to reduce waste, increase recycling, and reduce emissions of greenhouse gases from energy consumptions should be considered;
  - Protection of geodiversity and biodiversity in line with national guidance;
  - Protection of sites of archaeological interest focusing on those which are important at the local level;
  - Protection of the historic character of the district and the quality and local distinctiveness of landscapes and townscapes;
  - Considering ways to reduce the vulnerability to climatic events;
  - A key consideration should be to ensure that appropriate levels and types of employment land are delivered in accessible locations; and
  - The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority.

## Scenario 2: Address affordable housing needs and market housing needs

- 8.9 The approach to the provision of housing based on affordable housing needs in the district has led to the prediction of a range of moderately to significant positive effects against social and economic SA objectives. This includes for the provision of housing across the district by responding to specific identified affordable housing needs. This could help to reduce social exclusion and improve access to key services and facilities. The assessment highlights that this may increase the proportion of the community that live, work and play within their local area and lead to an increase in social mixing and cohesion, with greater effects being realised in the medium to longer term.
- 8.10 If this scenario is chosen housing numbers would significantly increase from existing levels of provision and it is predicted that this could result in significant negative effects against SA objective 11, 14, 15 and 17. Objective 11 seeks to protect soil resources and quantity, Objective 15 is aimed at reducing greenhouse emissions and Objective 17 is aimed at conserving and enhancing biodiversity and geodiversity in the district. Objective 14 seeks to reduce the effects of traffic on the environment.

### Recommendations

- 8.11 Several significant negative effects were predicted from the assessment of this scenario but more detail will emerge once the distribution and location of growth and the implications of these are considered as part of the Core Strategy preparation process and what effects this will have on the environment. Nevertheless a number of recommendations to improve the performance of this scenario towards the achievements of the SA objectives are made below.
- 8.12 It is recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted including:
- The effects of development on water quality and local air quality should be considered in more detail.
  - The effects of development on geodiversity and biodiversity as well as on sites of archaeological interest and the historic character of the district and the quality and local distinctiveness of landscapes and townscapes should be considered in more detail and these should be protected.
  - The provision of sustainable transport infrastructure and planting/greening to provide increased pollution sequestration should be considered and other ways of reducing the effects of traffic on the environment including ensuring that new sites for development should be within accessible distances to services and facilities and should be integrated with the green infrastructure network;
  - Inclusion of policies to reduce waste, increase recycling, and reduce emissions of greenhouse gases from energy consumptions should be considered;
  - Considering ways to reduce the vulnerability to climatic events;
  - It would be beneficial if housing growth is balanced with employment growth in the district; and
  - The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be



considered. This should include the use and remediation of potentially contaminated sites as the first priority.

### **Scenario 3: Depressed market and continuing the existing level of development**

- 8.13 The SA for this scenario has predicted no significantly positive effects against the social and economic objectives. The scenario would provide for slightly lower levels of housing development than what we have experienced in the district between 2001 and 2010. Several positive effects have been predicted. These effects could be enhanced by appropriate policy formulation in the submission Core Strategy, Site Specific Allocations and Development Management DPDs.
- 8.14 In terms of the effects on environmental SA objectives, only one moderately negative effect was predicted on Objective 11. Several negative effects were predicted but as would be the case for the other growth scenarios more detail will emerge once the distribution and location of growth and the implications of this are considered as part of the Core Strategy preparation process and what effects this will have on the environment.

#### **Recommendations**

- 8.15 Although only one moderately significant negative effect was predicted from the assessment of this scenario, recommendations to improve performance of this scenario towards the achievements of the SA objectives are made below.
- 8.16 It is recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted, including:
- The effects of development on water quality, local air quality, emissions, waste, geodiversity and biodiversity, sites of archaeological interest, the historic character of the district and the quality and local distinctiveness of landscapes and townscape, ways to reduce the vulnerability to climate change and access to services and employment should be considered; and
  - The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority.

### **Scenario 4: Market intervention / quick market recovery and continuation of existing level of development**

- 8.17 There is little difference in overall numbers between Scenarios 3 and 4 and there is little difference between the predicted sustainability effects. As with Scenario 3, no significantly positive effects against the social and economic objectives were predicted for Scenario 4. These effects could be enhanced by appropriate policy formulation in the submission Core Strategy, Site Specific Allocations and Development Management DPDs.
- 8.18 In terms of the effects on environmental SA objectives, only one moderately significant negative effect was predicted on Objective 11. Several negative effects were predicted but as would be the case for the other growth scenarios more detail will emerge once the distribution and location of growth and the implications of this

are considered as part of the Core Strategy preparation process and what effect this will have on the environment.

## Recommendations

- 8.19 Although only one moderately significant negative effect was predicted from the assessment of this scenario, recommendations to improve performance of this scenario towards the achievements of the SA objectives are made below.
- 8.20 It is recommended that consideration be given to the following aspects during the development of the submission Core Strategy, Site Specific Allocations and Development Management DPDs to mitigate negative effects and enhance positive effects predicted, including:
- The effects of development on water quality, local air quality, emissions, waste, geodiversity and biodiversity, sites of archaeological interest, the historic character of the district and the quality and local distinctiveness of landscapes and townscapes, ways to reduce the vulnerability to climate change and access to services and employment should be considered; and
  - The fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority

## Employment Scenarios

### Scenario 1: “Business as usual”

- 8.21 The SA of Scenario 1 predicted a number of moderately significant positive effects against the social and economic objectives. The scenario seeks to provide everyone with an opportunity to employment and achieve growth in the key sectors of the local economy, as well as increased economic diversification. It also aims to improve the provision of employment within the district through the identification of a range of both strategic and local employment sites across the plan area, as well as diversifying the local economy. Several other positive effects were predicted against the social and economic objectives.
- 8.22 In terms of the effects on environmental SA objectives, a range of negative effects are predicted. These effect may, however, be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.

## Recommendations

- 8.23 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives.

### Scenario 2: ‘Shortfall’ forecast figure and one-third of the former RSS jobs target

- 8.24 A number of moderately to significantly positive effects were predicted for this scenario against the social and economic objectives. This includes maintaining and improving skills in the district, reducing poverty and social inclusion, improving access to services, providing people with an opportunity to employment and improving the local economy by providing for high job growth over the next twenty years in the district. Several other positive effects were predicted against the social and economic objectives.

- 8.25 In terms of the effects on environmental SA objectives, a few significantly negative effects were predicted. These include loss of soil resources, increasing greenhouse emissions and loss of biodiversity. Several other negative effects were predicted against the environmental objectives. These effects, however, may be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.

### Recommendations

- 8.26 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives with particular emphasis on:
- Fragmentation of agricultural holdings should be avoided. The potential for development to be on brownfield land, ahead of Greenfield land should be considered. This should include the use and remediation of potentially contaminated sites as the first priority;
  - The provision of sustainable transport infrastructure and planning/ greening to provide increased pollution sequestration should be considered and other ways of reducing the effects of traffic on the environment including ensuring that new sites for development should be within accessible distances to services and facilities and should be integrated with the green infrastructure network;
  - Inclusion of policies to reduce waste, increase recycling, and reduce emissions of greenhouse gases from energy consumption should be considered; and
  - The effects of development on water quality and local air quality should be considered in more detail; and
  - The effects of development on geodiversity and biodiversity as well as on sites of archaeological interest and the historic character of the district and the quality and local distinctiveness of landscapes and townscapes should be considered in more detail and these should be protected.

### Scenario 3: Shortfall forecast figure and percentage growth to the jobs target up to 2031

- 8.27 A number of moderately positive to significantly positive effects were predicted for this scenario against the social and economic objectives, although for Scenario 2 more significantly positive effects were predicted than for this scenario. Moderately to significantly positive effects predicted for Scenario 3 includes maintaining and improving skills in the district, reducing poverty and social inclusion, improving access to services, providing people with an opportunity to employment and improving the local economy by providing for high job growth over the next twenty years in the district. Several other positive effects were predicted against the social and economic objectives.
- 8.28 In terms of the effects on environmental SA objectives, a few moderately significant negative effects were predicted against Objective 11, 15 and 17. These objectives are aimed at conserving soil resources, decreasing greenhouse emissions and conserving and enhancing biodiversity. Several other negative effects were predicted against the environmental objectives. These effects, however, may be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.

## Recommendations

- 8.29 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives (see Appendix B for full details).

### Scenario 4: Jobs growth target in accordance with housing growth target

- 8.30 Two moderately significant positive effects were predicted for this scenario against the social and economic objectives. The scenario seeks to provide everyone with an opportunity to employment and meeting the housing requirements of the community. Several other positive effects were predicted against the social and economic objectives. The significance of the positive effects could increase, depending on the exact numbers of jobs to be provided through this scenario.
- 8.31 In terms of the effects on environmental SA objectives, a range of negative effects were predicted. No significantly negative effects were predicated. Depending on the exact number of jobs to be provided, the significance of the negative effects could increase. These effects may, however, be offset to some extent through the inclusion of policies focussing on reducing impacts on the environment and reducing green house emissions.

## Recommendations

- 8.32 It is recommended that policies be considered in the submission Core Strategy, Site Specific Allocations and Development Management DPDs that would mitigate the predicted effects against the environmental objectives (see Appendix B for full details)..

## Cumulative, Synergistic and Indirect Effects

8.33 The detailed assessment, the results of which are presented in Appendix B, was focused primarily on direct and indirect (secondary) effects, acting in isolation. As required by the SEA Regulations, cumulative, synergistic and indirect effects have also been recorded and analysed during the appraisal. Details of the methodology used can be found in Section 2.

8.34 Table 8.2 shows the results of this analysis.

**Table 8.2 - Cumulative, Synergistic and Indirect Effects**

Scenario	Effects	Causes	Significance
Housing Growth and Employment Growth 1, 2, 3,4	Synergistic, Cumulative and Indirect effects on tackling poverty and social exclusion, reducing crime and fear of crime and improve health levels	<p>A number of the scenarios may help to reduce poverty and social exclusion in the district, both cumulatively and indirectly. Secondary effects may include reduced rates of crime and a fear of crime. Factors potentially contributing to this include:</p> <p>Improving the quality of housing and development as well as affordability;</p> <p>Improving skills levels and access to community facilities, education and employment;</p> <p>Improving access to health facilities may have more direct benefits on health levels, whereas policies that seek to improve accessibility by sustainable modes of transport and the overall provision of community facilities including open space may not only improve access, but indirectly improve physical and mental health levels through an increase in physical activity and a reduction in the fear of crime.</p> <p>Synergistically, an increase in the use of more sustainable modes of transport, including walking and cycling, added to the increased provision of open green space could have multiple environmental benefits. These could include improved air, noise and water quality amongst others, which will have benefits for human health both physically and mentally.</p> <p>Increased community interaction through the above measures of increasing walking as a mode of transport and the provision of areas of open space and community facilities within local areas is also likely to have beneficial effects on reducing social exclusion, which can also have increased positive effects on health levels.</p>	Significant positive effects likely over the longer term as development proposals and infrastructure completed, providing this is done in an equitable way across the plan area and areas of deficiency are targeted.

Scenario	Effects	Causes	Significance
Housing Growth and Employment Growth 1, 2, 3,4	Cumulative negative effects on soils, biodiversity, geodiversity and landscape	Potential loss of non-designated habitats and landscapes with consequences for the ability of the environment to maintain species diversity as a consequence of policies that could result in the development of large amounts of greenfield land.  Indirect effects may arise through a potential increase in traffic levels, both from public and private transport as the rural areas experience new transport infrastructure (i.e. additional land-take and the encroachment of traffic into new areas). Effects may be more pronounced over the long term as a loss of connectivity between habitats results in a loss of the ability of species to adapt to the changes in climate.	Negative effects in the long term unless comprehensive policies are developed at the DM/Site Allocations stage.
1, 2, 4,5	Synergistic negative effects on a loss of vegetation and soils leading to a loss of carbon sinks and pollution sequestration.	Policies will result in a loss of soil resources through the development of large areas of greenfield land, which could significantly reduce the capacity of the local carbon sink to combat pollutants. Air quality may decline also as a result of a loss of vegetation providing pollution sequestration.	Negative effects overall in terms of protecting and maintaining natural resources and an increase in GHG emissions.

- 8.35 The assessment serves to highlight the need for those elements that are expected to result in significant effects to be addressed more overtly as part of the DPD process, supported by mitigation as appropriate, as well as enhancement of beneficial effects where possible.

## 9. Conclusions

- 9.1 This SA Report sets out the SA process and its key findings in relation to the Growth Scenarios and Broad Locations of the BDC Draft Core Strategy.
- 9.2 The assessment of the Growth Scenarios has indicated that the scenarios within the BDC Core Strategy (Growth Options) are predicted to have a range of sustainability effects. Particularly strong features of the growth scenarios from the sustainability perspective are:
- A large number of the benefits including some of significance can be attributed to scenarios that provide for high economic growth and relate mainly to maintaining and improving skills in the district, reducing poverty and social inclusion, improving access to services, providing people with an opportunity to employment and improving the local economy by providing for high job growth over the next twenty years in the district. Some significant negative effects have also been predicted against the environmental objectives relating to loss of soil resources, increases in greenhouse emissions and loss of biodiversity. Many of these could potentially be mitigated by including policies to address these issues in the submission Core Strategy, Site Specific Allocations and the Development Management DPDs.

- The scenarios with lower economic growth scenario and balanced economic and housing growth scenario are predicted to have a large number of positive benefits although fewer in significance. These benefits include maintaining and improving skills in the district, improving health, reducing poverty and social inclusion, reducing crime, improving access to services, providing people with an opportunity to employment and improving the local economy. No significantly negative effects have been predicted against environmental objectives although a number of moderately negative effects were predicted. Many of these could be mitigated and it would be important that the submission Core Strategy, Site Specific Allocations and the Development Management DPDs include policies to mitigate these predicted effects.
- A number of moderately to significantly positive effects have been predicted for the housing scenario that balances housing and employment growth. These positive effects include improving skills in the district, reducing poverty and social exclusion, providing employment and meeting housing needs in the district as well as improving the local economy. Significantly negative effects were identified against environmental objectives relating to soil resources, greenhouse emissions and biodiversity. These could potentially be mitigated by including policies in the Core Strategy, Site Specific Allocations and the Development Management DPDs to address these aspects.
- A few moderately to significantly positive effects were predicted for the scenario aimed at providing for the affordable housing need in the district including reducing poverty and social exclusion, improving access to services and meeting housing needs in the district. Several significantly negative effects were identified against environmental objectives relating to soil resources, traffic effects, greenhouse emissions and biodiversity. It would be important that the Core Strategy, Site Specific Allocations and the Development Management DPDs include policies to mitigate these predicted effects. This will have to be considered in more detail as more information becomes available during the production of the Core Strategy and other DPDs.
- A number of positive effects against social indicators were identified for the depressed market and average growth housing scenario; and the improved market/ market intervention and average growth housing scenario. Several negative effects were also identified against environmental objectives. No significant effects were identified. It would be important that the submission Core Strategy, Site Specific Allocations and the Development Management DPDs include policies to mitigate these predicted negative effects.



## 10. References

- European Commission (2001) Directive 2001/42/EC "on the assessment of the effects of certain plans and programmes on the environment".
- ODPM (September 2005). A Practical Guide to the Strategic Environmental Assessment Directive
- ODPM (November 2005) Sustainability Appraisal of Regional Spatial Strategies and Local Development Documents
- Environmental Assessments of Plans and Programmes Regulations (Statutory Instrument 2004 no. 1633)
- The Planning and Compulsory Purchase Act 2004
- The Town and Country Planning (Local Development)(England) (Amendment) Regulations 2008
- Commission for Architecture and the Built Environment (CABE) and the Home Builders Federation, *Building for Life: the 20 Criteria*, <http://www.buildingforlife.org/criteria/> and *Delivering great places to live: 20 questions you need to answer* (2008 Edition), <http://www.buildingforlife.org/files/publications/bfl-criteria-guide.pdf>
- CLG December 2007, *Planning Policy Statement: Planning and Climate Change - Supplement to Planning Policy Statement 1*, <http://www.communities.gov.uk/publications/planningandbuilding/ppsclimatechange>
- CLG March 2010, *Consultation on a Planning Policy Statement: Planning for a Low Carbon Future in a Changing Climate*, <http://www.communities.gov.uk/publications/planningandbuilding/ppsclimateconsultation>
- CLG March 2010, *Consultation paper on a new Planning Policy Statement: Planning for a Natural and Healthy Environment*, <http://www.communities.gov.uk/publications/planningandbuilding/naturalenvironmentconsultation>

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## **Atkins Limited**

Woodcote Grove, Ashley Road,  
Epsom, Surrey KT18 5BW, England

**Contact:** Cristina West  
**Telephone number:** +44 (0) 1372 756931  
**Fax number:** +44 (0) 1372 746608

**Email:** [cristina.west@atkinsglobal.com](mailto:cristina.west@atkinsglobal.com)  
**Web address:** [www.atkinsglobal.com/environment](http://www.atkinsglobal.com/environment)